

## Broadband USA Applications Database

**Applicant Name:** Iowa Communications Network

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### Public Notice Submissions

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-----**Service Area:** Service Area 2

**Submitter:** Goldfield Access Network

**Comment:** Based on the definition of underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the proposed service areas of Clarion and Renwick, Iowa are not underserved and do not qualify for Broadband Stimulus funds. Goldfield Access Network (Goldfield) is capable of providing broadband to 100% of the residences and businesses in Clarion and Renwick as well as Community Anchor Institutions (CAI).

**Submitter:** Stratford Mutual Telephone Company

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Northwest Communications, Inc

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Heart of Iowa Communications Cooperative

**Comment:** Heart of Iowa Communications Cooperative was established in 1958 to provide quality telephone service in rural Central Iowa. Since its inception, Heart of Iowa has been evolving to keep up with the many changes and demands in the telecommunications industry. To diversify its service offerings, Heart of Iowa launched its Broadband High Speed Internet service in 2000. Heart of Iowa has provided service in Union and New Providence since 1958, in Whitten since 1960 and in Eldora and

Steamboat Rock since the late 1990s. Broadband High Speed Internet service has been available to the areas since 2000.

**Submitter:** ATC Cablevision

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** IOWA NETWORK SERVICES, INC.

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

The seven geographical areas identified for expansion and detailed in ICN Service Area Maps One through Seven are not unserved or underserved territories.

Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve
- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

**Submitter:** Communications 1 Network, Inc.

**Comment:** Communications 1 Network, Inc. has just completed a Fiber To The Home (FTTH) buildout throughout all three exchanges that they provide service in. The exchanges are Kanawha, Ia., Klemme, Ia. and Corwith, Ia.

**Submitter:** Radcliffe Telephone Company, Inc.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Lehigh Valley Coop Telephone Assn.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Complete Communication Services Corp

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Frontier Communications of Iowa, LLC

**Comment:** A portion of the applicant's territory is already served by the respondent. 3MG speed or higher is available and advertised.

**Submitter:** Northwest Telephone Cooperative Association

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Clear Lake Independent Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Evertex, Inc.

**Comment:** Evertex provides Broadband Internet to the service area indicated and has been a provider within this territory for the past 10 years. We have continued success with the packages and bundling that we offer and are able to meet the demands of our customer base by providing a feature rich and redundant system.

**Submitter:** Cooperative Telephone Exchange

**Comment:** Based on the definition of underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the Iowa exchanges of Stanhope and Kamrar are not underserved and do not qualify for Broadband Stimulus funds. Cooperative Telephone Exchange provides broadband to 100% of the residences and businesses of Stanhope and Kamrar. Data to further substantiate this response can be found in the comments section below.

**Submitter:** Goldfield Telephone Company

**Comment:** Based on the definition of underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the proposed service area of Goldfield is not underserved and does not qualify for Broadband Stimulus funds. Goldfield Telephone Company (Goldfield) is capable of providing broadband to 100% of the residences and businesses in Goldfield as well as Community Anchor Institutions (CAI).

**Submitter:** Webster-Calhoun Cooperative Telephone Association

**Comment:** Webster-Calhoun Cooperative Telephone Association demonstrates that it provides broadband service throughout Webster and Humboldt Counties which are encompassed in the proposed funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Webster-Calhoun's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Webster-Calhoun; 100% of the households in Webster-Calhoun's service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** Ayrshire Farmers Mutual Telephone

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** OmniTel Communications

**Comment:** Iowa Communications Network's proposed project covers the community of Rock Falls served by OmniTel Communications. In this public notice response OmniTel is providing; 1) a map of the overlapping area where OmniTel provides broadband services, 2) the number of residential households and business establishments capable of receiving broadband services from OmniTel within its service territory, 3) the number of residential households and business establishments subscribing to OmniTel's broadband service within the proposed service area, and 4) comments addressing the existing services offered within the proposed funded service area.

**Submitter:** Winnebago Cooperative Telecom Association

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Miller Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** River Valley Telecommunications Coop

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----**Service Area:** Service Area 4

**Submitter:** WTC communications

**Comment:** WTC communications is the registered ILEC for the city of Wilton and the surrounding area. WTC through its affiliation with Iowa Network services provides its customers and community anchor institutions a wide variety of phone services, enhanced calling features, HD CATV and tiered internet speeds up to 1.5megs. The anchor institutions consist of; The Wilton City offices, the High school and Elementary School, and the Wilton city Library are provided discounted Internet services and cable TV. To maintain critical services WTC communications backbone network consists of a redundant OC-12 and a 20meg internet ring interconnected with Iowa Network Services in Des Moines and the surrounding ILEC's providing 100 percent backup to WTC communications customers and its anchor institutions.

**Submitter:** Clarence Telephone Company, Inc.

**Comment:** Clarence Telephone Company, Inc. demonstrates that it provides broadband service throughout the Cedar County which is encompassed in the proposed funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Clarence Telephone's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Clarence Telephone; 100% of the households in Clarence Telephone's service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; Clarence Telephone advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** IOWA NETWORK SERVICES, INC.

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

The seven geographical areas indentified for expansion and detailed in ICN Service Area Maps One through Seven are not unserved or underserved territories.

Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its

dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground

- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve
- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

**Submitter:** Wellman Cooperative Telephone Association

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** F&B Communications

**Comment:** Broadband funding for the Iowa exchanges of Lowden and Bennett should be funded through the F&B Communications application rather than the Iowa Communications Network application. Data to further substantiate this response can be found in the comments section below.

**Submitter:** Mutual Telephone Company of Morning Sun

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** West Liberty Telephone Co

**Comment:** West Liberty Telephone co dba Liberty Communications serves the communities of West Liberty, West Branch and their surrounding rural areas listed on the attached maps. All customers in the mapped area may subscribe to Internet service up to 8 Mbps. The services the Iowa Communication Network wants to offer in the future can be provided today by Liberty Communications fiber network.

**Submitter:** MTC Technologies

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** South Slope Cooperative Telephone Company

**Comment:** South Slope Cooperative Telephone Company (South Slope) demonstrates that it provides broadband service throughout the entire area encompassed in the proposed funded Service Area in the Iowa Communications Network application; that no interconnection point identified in the proposed project and no part of the proposed project terminates in a proposed funded Service Area that qualifies as unserved or underserved for Last Mile projects; and all of the Last Mile areas to be served identified in the application are served with broadband service by South Slope. Further, South Slope demonstrates that in addition to providing its own last mile broadband services, South Slope has middle mile broadband facilities providing sufficient capacity to support the provision of broadband service to end users.

As demonstrated, 100% of households in the proposed funded Service Area, including the identified interconnection points, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from South Slope; 100% of the households in the proposed funded Service Area, including the identified interconnection points, have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; South Slope advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area, including the identified interconnection points; and the rate of broadband subscribership for the proposed funded Service Area, including the identified interconnection points, is greater than 40 percent of households.

**Submitter:** Sharon Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Louisa Communications

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Danville Telecom

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----**Service Area:** Service Area 7

**Submitter:** Cable One, Inc.

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant's Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one's current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - \$20.00

Standard , Speed (Down/up) - 5 Mb/500 kbps, Service Rate - \$43.00

Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - \$53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - \$69.65

Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - \$85.95

Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - \$99.95

Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - \$199.95

Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - \$299.95

Discounted bundles and promotional pricing are also available.

**Submitter:** Marne & Elk Horn Telephone Company

**Comment:** Marne & Elk Horn Telephone Company is providing information regarding the number of residential households and business establishments capable of receiving broadband in the area that the applicant's PFSA overlaps the respondent's service area. Marne & Elk Horn Telephone Company is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. In the area of overlap, approximately 80% of households have access to facilities-based broadband service.

**Submitter:** Panora Telecommunications, Inc

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** SiouxLan Communications

**Comment:** SiouxLan Communications provides Broadband Internet to the service area indicated and has been a provider within this territory for the past 5 years. We have continued success with the

packages and bundling that we offer and are able to meet the demands of our customer base by providing a feature rich and redundant system.

**Submitter:** Loganet

**Comment:** To Whom It May Concern:

Hello, my name is Danny Olson and I am writing this on behalf of my employer, Loganet. Loganet specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrum available from the FCC. Our organization has been in business for over 7 years and services the broadband needs of rural Southeastern Nebraska and Western Iowa. Through careful business management and investment we have built a network which now provides broadband services to nearly 1200 subscribers, in 2 states, 12 counties and from nearly 50 tower sites. In the areas we provide service we often compete with wired and other wireless service providers who may use license and license-exempt delivery methods. We differentiate our product through helpful technical support and quality customer service. We grow our business as customer demand drives our revenues and retract in areas of significant competition.

We recently discovered Iowa Communications Network has requested funds to build a network in Harrison County Iowa from the Broadband stimulus package. I wish to submit a dispute regarding the "underserved" designation of this area by Iowa Communications Network. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both our organization to provide quality services.

**Submitter:** Cox Communications, Inc

**Comment:** Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over \$16 billion in private capital in its network over the last ten years. Cox provides its customers in Nebraska and Iowa with 21st

century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox's broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

**Submitter:** Walnut Telephone company, Inc. dba/Walnut Communic

**Comment:** Walnut Telephone Company, Inc. dba/Walnut Communications is a 95 year old telecommunications company that has provided broadband to its customers for 11 years at speeds of up

to 5MB or higher. Broadband is transmitted via twisted pair copper, COAX, fiber-to-the-home, and wireless.

**Submitter:** Panora Communications Cooperative

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** IOWA NETWORK SERVICES, INC.

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

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Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

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Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve
- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

**Submitter:** Scranton Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Southwest Telephone Exchange

**Comment:** Southwest Telephone Exchange demonstrates that it provides broadband service throughout the Imogene, Emerson and Henderson Areas which are encompassed in the proposed

funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Southwest Telephone Exchange's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Southwest Telephone Exchange; 100% of the households in Southwest Telephone Exchange's service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; Southwest Telephone Exchange advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** Farmers Mutual Cooperative Telephone Co.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Frontier Communications of Iowa, LLC

**Comment:** A portion of the applicant's territory is already served by the respondent. 3MG speed or higher is available and advertised.

**Submitter:** WesTel Systems

**Comment:** WesTel Systems demonstrates that it provides broadband service throughout the Anita area which is encompassed in the proposed funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in WesTel's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from WesTel; 100% of the households in WesTel's service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; WesTel advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded

Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** Webster-Calhoun Cooperative Telephone Association

**Comment:** Webster-Calhoun Cooperative Telephone Association demonstrates that it provides broadband service throughout Greene County which is encompassed in the proposed funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Webster-Calhoun's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Webster-Calhoun; 100% of the households in Webster-Calhoun's service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** Panora Cooperative Cablevision Association, Inc

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Breda Telephone Corp. dba Western Iowa Networks

**Comment:** Iowa Communications Network's proposed project covers all of the exchange areas that are served by Breda Telephone Corp. dba Western Iowa Networks and our subsidiaries, including Breda, Lidderdale, Carroll, Macedonia, Westside, Yale, Pacific Junction and Farragut. We currently serve the exchanges by an existing Copper - ADSL2+ network that extends from our corporate headquarters in Breda, IA, and also a high-voltage subscriber carrier at the exchange Central Office. Our Carroll exchange has Fiber-to-the-Home. In the public notice response Western Iowa Networks (WIN) is providing; 1) a map of the overlapping area WIN provides broadband services, 2) WIN's DSL high speed internet advertising 3) the number of residential households and business establishments capable of receiving broadband services, 4) the number of residential households and business establishments subscribing to

our broadband, 5) the advertised download and upload speeds and service rates, and 6) comments addressing the existing services offered within the proposed funded service area.

**Submitter:** Jefferson Telephone Company

**Comment:** Jefferson Telephone Company demonstrates that it provides broadband service throughout its entire service area located in Greene County, Iowa, which is included in the proposed Service Area of the Iowa Communications Network, Inc. application and that Jefferson Telephone's service area is not unserved or underserved.

As demonstrated, 100% of households in Jefferson Telephone's service area are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from Jefferson Telephone; 100% of the households in Jefferson Telephone's service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; Jefferson Telephone advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout its service area; and the rate of broadband subscribership in Jefferson Telephone's service area is greater than 40 percent of households.

-----**Service Area:** Service Area 6

**Submitter:** Guthrie Telecommunications Network, Inc.

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Van Buren Telephone Co. Inc.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** IOWA NETWORK SERVICES, INC.

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

The seven geographical areas indentified for expansion and detailed in ICN Service Area Maps One through Seven are not unserved or underserved territories.

Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve
- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

**Submitter:** Interstate 35 Telephone Company and Southwest Tele

**Comment:** Interstate 35 Telephone Company and Southwest Telephone Exchange demonstrate that they provide broadband service throughout Truro, St Marys, St Charles, Imogene, Emerson and Henderson which are encompassed in the proposed funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in I 35 & SWT's service territories within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from I 35 & SWT; 100% of the households in I 35 & SWT's service territories within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; I 35 & SWT advertise broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** Citizens Mutual Telephone Cooperative

**Comment:** Citizens Mutual Telephone provides broadband service in excess of 3mb to 100% of our service area which covers most of Davis County, Iowa. Nearly half of our customer base has FTTH and the rest are served by short copper lines. There are no underserved customers in this service area.

**Submitter:** Farmers Mutual Cooperative Telephone Co - Moulton

**Comment:** Farmers Mutual Cooperative Telephone of Moulton, IA, updated all route miles in 2008 with a fiber-to-the-home construction using RUS borrowed funds. 100% of households in the Moulton service area are capable of obtaining broadband internet with speeds up to 5 Meg. Higher speeds are available to any customers upon request. Farmers Mutual Telephone also updated all central office equipment using new Nortel switching equipment and Calix C7 equipment for broadband services.

**Submitter:** Grand River Mutual Tel / South Central Rural Tel.

**Comment:** Iowa Communications Network's application covers part of Grand River Mutual Telephone Company / South Central Rural Telephone's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

**Submitter:** IOWA NETWORK SERVICES, INC.-Corrected filing

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

The seven geographical areas identified for expansion and detailed in ICN Service Area Maps One through Seven are not unserved or underserved territories.

Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public

money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve
- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

-----**Service Area:** Service Area 3

**Submitter:** Cascade Communications Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Alpine Communications, L.C.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** USA Communications, Inc.

**Comment:** Based on the definition of underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the Iowa exchange of Alburnett is not underserved and does not qualify for Broadband Stimulus funds. USA Communications (USA) provides broadband to 100% of the residences and businesses in Alburnett. Data to further substantiate this response can be found in the comments section below.

**Submitter:** Heart of Iowa Communications Cooperative

**Comment:** Heart of Iowa Communications Cooperative was established in 1958 to provide quality service in rural Central Iowa. Since its inception, Heart of Iowa has been evolving to keep up with the many changes and demands of the telecommunications industry. To diversify its service offerings, Heart of Iowa launched its Broadband High Speed Internet service in 2000. Heart of Iowa began offering service to the Beaman and Conrad areas in the late 1990s and has offered Broadband High Speed Internet since 2000.

**Submitter:** Baldwin-Nashville Telephone Company, Inc.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Central Scott Telephone Company

**Comment:** Central Scott Telephone Co. provides Digital Subscriber Line broadband service in Scott County Iowa at speeds exceeding the NOFA definition. The service is offered at every customer location in our serving area. This includes the towns of Donahue, Long Grove Park View and McCausland and adjacent rural areas. Speeds are offered and subscribed which exceed 3 M downstream. Subscribership exceeds 40% of locations within regulated telephone exchange area.

**Submitter:** IOWA NETWORK SERVICES, INC.

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

The seven geographical areas identified for expansion and detailed in ICN Service Area Maps One through Seven are not unserved or underserved territories.

Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC

partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should

look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve
- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

**Submitter:** Springville Co-Op Telephone Assn., Inc.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** La Motte Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** F&B Communications

**Comment:** Broadband funding for the Iowa exchange of Delmar should be funded through the F&B Communications application rather than the Iowa Communications Network application. Data to further substantiate this response can be found in the comments section below.

**Submitter:** Bernard Telephone Co., Inc.

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Farmers Mutual Telephone Company

**Comment:** Farmers Mutual Telephone Company is providing voice, data and video with in our exchange borders, which is registered with the Iowa Utility Board. Farmers Mutual Telephone Co. is providing a broadband connection that exceeds the broadband standards set forth by the FCC. Our advertised broadband transmission speeds is advertised at [www.jtt.net](http://www.jtt.net) We are providing this connection by using ADSL2+ technology and our entire exchange can be served by this technology.

**Submitter:** Dunkerton Telephone Cooperative

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Hawkeye Telephone CO

**Comment:** Hawkeye Telephone is the registered ILEC for the city of Hawkeye and the surrounding area. Hawkeye telephone through its affiliation with Iowa Network services provides its customers and

community anchor institutions a wide variety of phone services, enhanced calling features, Analog CATV and tiered internet speeds up to 3megs. The anchor institutions, North Fayette Elementary School and the Hawkeye city Library are provided discounted Internet services and free cable TV. To maintain critical services Hawkeye telephone's backbone network consists of a redundant OC-48 and a 4gig DWDM ring interconnected with Iowa Network Services in Des Moines and the surrounding ILEC's providing 100 percent backup to Hawkeye telephone and its anchor institutions. Iowa Communications Network has no redundant backbone in the City of Hawkeye.

**Submitter:** Butler-Bremer Mutual Telephone

**Comment:** To maintain critical services Butler-Bremer's telephone's backbone network consists of a redundant 10 gig internal network and a Multi-company fiber redundant fiber network expandable to 56 gigs; interconnected with Iowa Network Services in Des Moines. With this advanced fiber communication system Butler-Bremer Telephone can provide 100 percent internet coverage to all communities within their exchange areas including all anchor institutions, schools and libraries with redundant high reliability communications.

**Submitter:** South Slope Cooperative Telephone Company

**Comment:** South Slope Cooperative Telephone Company (South Slope) demonstrates that it provides broadband service throughout the entire area encompassed in the proposed funded Service Area in the Iowa Communications Network application; that no interconnection point identified in the proposed project and no part of the proposed project terminates in a proposed funded Service Area that qualifies as unserved or underserved for Last Mile projects; and all of the Last Mile areas to be served identified in the application are served with broadband service by South Slope. Further, South Slope demonstrates that in addition to providing its own last mile broadband services, South Slope has middle mile broadband facilities providing sufficient capacity to support the provision of broadband service to end users.

As demonstrated, 100% of households in the proposed funded Service Area, including the identified interconnection points, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from South Slope; 100% of the households in the proposed funded Service Area, including the identified interconnection points, have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; South Slope advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area, including the

identified interconnection points; and the rate of broadband subscribership for the proposed funded Service Area, including the identified interconnection points, is greater than 40 percent of households.

**Submitter:** Readlyn Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** OmniTel Communications

**Comment:** Iowa Communications Network's proposed project covers the communities of Floyd, Little Cedar, New Haven, Nora Springs, Riceville, Rockford and Rudd served by OmniTel Communications. In this public notice response OmniTel is providing; 1) a map of the overlapping area where OmniTel provides broadband services, 2) the number of residential households and business establishments capable of receiving broadband services from OmniTel within its service territory, 3) the number of residential households and business establishments subscribing to OmniTel's broadband service within the proposed service area, and 4) comments addressing the existing services offered within the proposed funded service area.

**Submitter:** East Buchanan Telephone Cooperative

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Dumont Telephone Company

**Comment:** Dumont Telephone Company is the LEC that currently provides broadband to the communities of Allison and Dumont and the rural areas surrounding them. We currently offer 1 Mbps to all residential and business customers in Dumont and Allison. We currently have FTTH to all residents with Dumont and when finished with the rural area, we have plans to start construction of FTTH in Allison. When finished, we will have a GPON FTTH system to all customers in Dumont, Allison and the surrounding areas.

**Submitter:** La Porte City Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Preston Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Shellsburg Cablevision

**Comment:** Broadband stimulus funding for the Iowa exchanges of Coggon and Ryan should be funded through the Shellsburg Cablevision, Inc. application rather than the Iowa Communications Network application. Data to further substantiate this response can be found in the comments section below.

**Submitter:** Miles Coop. Telephone Assn.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Lost Nation-Elwood Telephone Company

**Comment:** Lost Nation-Elwood Telephone Company has been serving our rural area since 1902. We currently serve the communities and rural areas of Lost Nation, Iowa and Oxford Junction, Iowa located in Clinton, Jones, Jackson and Cedar counties. As the incumbent local exchange carrier and by NOFA definition, Lost Nation-Elwood Telephone Companies service area is neither unserved nor underserved.

Due to the satisfaction of the definitions outlined in the NOFA, we feel this application should be found invalid and no ARRA funds be made available to the applicant in this area.

-----**Service Area:** Service Area 5

**Submitter:** USA Communications, Inc.

**Comment:** Based on the definition of underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the Iowa exchanges of Shellsburg and Urbana are not underserved and do not qualify for Broadband Stimulus funds. USA Communications (USA) provides broadband to 100% of the residences and businesses in Shellsburg and Urbana. Data to further substantiate this response can be found in the comments section below.

**Submitter:** Panora Telecommunications, Inc

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Heart of Iowa Communications Cooperative

**Comment:** Heart of Iowa Communications Cooperative was established in 1958 to provide quality telephone service in rural Central Iowa. Since its inception, Heart of Iowa has been evolving to keep up with the many changes and demands of the telecommunications industry. To diversify its service offerings, Heart of Iowa launched its Broadband High Speed Internet service in 2000. Heart of Iowa has provided service in the Albion and Liscomb exchanges since 1965, the Haverhill and Ferguson exchanges since 1971 and the Laurel exchange since 2006. Broadband High Speed Internet service has been available to the exchanges since 2000 (and in Laurel since 2006).

**Submitter:** Colo Telephone Company

**Comment:** Colo Telephone Company has provided High Speed Broadband to 100 % of its serving area through DSL since 2001 and is currently finishing fiber to the home to 100 % of its customers this year. Colo Telephone Company has a 15 meg internet backbone service which provides us with the ability to serve our customers with a large amount of bandwidth now and in the future.

**Submitter:** Partner Communications Cooperative

**Comment:** Partner Communications Cooperative offers three DSL broadband plans throughout our service area with downloads ranging from up to 1 Meg, up to 3 Meg and up to 5 Meg. We offer

additional flexibility through our "Add a Meg" program, which allows plans with downloads up to 2 Meg and up to 4 Meg. Partner provides DSL broadband service throughout 228 square miles of Iowa Communications Network's Marshall, Jasper, Tama, Poweshiek, and Story County Proposed Funded Service Area. We have 1280 Residential and 97 Business broadband customers within the Iowa Communications Network's Marshall, Jasper, Tama, Poweshiek, and Story County PFSA.

**Submitter:** Modern Cooperative Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** IOWA NETWORK SERVICES, INC.

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

The seven geographical areas identified for expansion and detailed in ICN Service Area Maps One through Seven are not unserved or underserved territories.

Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC

partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should

look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve
- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

**Submitter:** Minburn Telecommunications, Inc.

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Complete Communication Services Corp

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Coon Creek Telephone Company

**Comment:** Based on the definition of underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the Iowa towns of Blairstown, Marengo and Belle Plaine are not underserved and do not qualify for Broadband Stimulus funds. Coon Creek Telephone Company (Coon Creek) provides broadband to 100% of the residences and businesses in Blairstown and over 90% of the residences and businesses in Marengo and Belle Plaine. Data to further substantiate this response can be found in the comments section below.

**Submitter:** Huxley Communications Cooperative

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Minburn Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Webster-Calhoun Cooperative Telephone Association

**Comment:** Webster-Calhoun Cooperative Telephone Association demonstrates that it provides broadband service throughout Boone County which is encompassed in the proposed funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Webster-Calhoun's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Webster-Calhoun; 100% of the households in Webster-Calhoun's service territory within the proposed

funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** South Slope Cooperative Telephone Company

**Comment:** South Slope Cooperative Telephone Company (South Slope) demonstrates that it provides broadband service throughout the entire area encompassed in the proposed funded Service Area in the Iowa Communications Network application; that no interconnection point identified in the proposed project and no part of the proposed project terminates in a proposed funded Service Area that qualifies as unserved or underserved for Last Mile projects; and all of the Last Mile areas to be served identified in the application are served with broadband service by South Slope. Further, South Slope demonstrates that in addition to providing its own last mile broadband services, South Slope has middle mile broadband facilities providing sufficient capacity to support the provision of broadband service to end users.

As demonstrated, 100% of households in the proposed funded Service Area, including the identified interconnection points, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from South Slope; 100% of the households in the proposed funded Service Area, including the identified interconnection points, have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; South Slope advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area, including the identified interconnection points; and the rate of broadband subscribership for the proposed funded Service Area, including the identified interconnection points, is greater than 40 percent of households.

**Submitter:** Cooperative Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** La Porte City Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Sully Telephone Association

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Panora Cooperative Cablevision Association, Inc

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Ogden Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----**Service Area:** Service Area 1

**Submitter:** Webb-Dickens Tel. Corp. dba Premier Communications

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Mutual Telephone Co. d/b/a Premier Communications

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** HTC Communications

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Royal Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Evertex, Inc

**Comment:** Evertex provides Broadband Internet to the service area indicated and has been a provider within this territory for the past 10 years. We have continued success with the packages and bundling that we offer and are able to meet the demands of our customer base by providing a feature rich and redundant system.

**Submitter:** IOWA NETWORK SERVICES, INC.

**Comment:** Comments on the ICN Broadband Extension Project

Application name: Iowa Communications Network

Project Title: Iowa BTOP Middle Mile Infrastructure Project

Project Type: Middle Mile

Comments by Iowa Network Services, Inc.

Iowa Communications Network (ICN), a state agency, seeks over \$12 million to build a 1G symmetrical Ethernet access network that would essentially overlay existing fiber networks that are already established, in-service, and operated by Iowa Network Services and other providers.

The seven geographical areas identified for expansion and detailed in ICN Service Area Maps One through Seven are not unserved or underserved territories.

Iowa Network Services (INS) offers access to over 5,000 existing fiber optic route miles within the state of Iowa. In addition, fiber networks operated by Qwest, Iowa Telecom, and other smaller carriers also serve some locations throughout the state. Through our 34 points of presence and local LEC partnerships throughout Iowa, the INS statewide fiber optic network featuring fully redundant DS1 to 10 Gigabit Ethernet service is, indeed, available to all Community Anchor Institutions including educational facilities, hospitals, libraries, public safety, and workforce development locations.

In 1984, Iowa Network Services was conceived to provide state-of-the-art telecommunications services to rural Iowa and has successfully done so over the past two decades. Iowa Network Services has been critical to the delivery of competitive long distance telephone services since the late 1980's, Internet access in the early 1990's, and Internet protocol television today. The INS Network was initially intended for use by 150 locally owned independent telephone companies in rural communities throughout the state of Iowa.

Today that use has expanded. INS continues to provide connectivity services to the independents in addition to providing full network access to other entities including the ICN, other major land line interexchange carriers, regional and national wireless carriers, and private businesses requiring high capacity fiber, broadband services and more. The INS Network is available to any customer and would welcome the opportunity to expand its partnership with the ICN. Part of the INS mission is to provide opportunity for its customers. This mission drives INS to always strive to develop the network its customers need.

As stated in a 2007 ICN Strategic Plan, the greatest ICN asset is its 3,100 miles of network optical fiber. The Plan also states the major limitations hampering the efficient operation of the ICN Network are its dependence upon appropriated funding for capital investments, constraints placed upon the Network operations by statute, and the funding stream needed to implement network strategies.

In addition, its current ATM and Frame Relay telecommunications platform is antiquated.

The ICN is funded completely by state appropriations from tax dollars and USF monies to administer a fiber optic network to authorized users as defined under the Code of Iowa. ICN is seeking additional public funding to offer expanded services where services and competitive options already exist. If public money is used to upgrade the ICN network, unfair competition will be created. When using the BTOP funds, the base line objective is to provide broadband services to unserved or underserved markets with the funds available.

The ICN goals can be met today without additional government funded build out. Broadband capacity is available to ICN by multiple, competitive carriers throughout the state of Iowa. The government should look to support providers such as Iowa Network Services and others that currently have the ability to provide state-of-the-art telecommunication services.

In closing, over \$231 million has already been invested by state and federal government in the development of the ICN Network from tax dollars and from the FCC's Universal Service Fund (a fund sustained by the customers of the private networks with which ICN seeks to compete). It is estimated that 10-15% of an initial investment is required to maintain and upgrade a network. To further invest public dollars by awarding this application would jeopardize Iowa's taxpayers as well as current providers who successfully provide broadband within Iowa.

We oppose the Iowa Communications Network application because:

- overbuilding an existing, dated network does not fulfill the need for broadband expansion in rural areas
- the taxes we pay would continue to subsidize their network
- State of Iowa funds have currently been cut due to economic conditions; therefore, the state of the ICN is uncertain
- it generates unfair competition with the private sector
- it adds unnecessary infrastructure in the ground
- stagnant and/or decreasing revenues due to competition would make it difficult for existing providers to provide broadband services in areas that are expensive and difficult to serve

- in the future, ongoing maintenance and upgrades to a network that is already archaic will further burden Iowa taxpayers

**Submitter:** Terril Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Mabel Cooperative Telephone Company

**Comment:** Mabel Cooperative Telephone Company serves the communities and surrounding areas of Mabel, Hesper, Burr Oak, and Ridgeway in southeastern Minnesota and northeastern Iowa. Mabel Cooperative is the incumbent local exchange carrier in this area and by the NOFA definitions of broadband, these areas are neither unserved nor underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in these areas.

**Submitter:** Northwest Telephone Cooperative Association

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Northwest Communications

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Peoples Telephone Company

**Comment:** Peoples Telephone Company serves the rural community and surrounding areas of Aurelia, in Cherokee County, Iowa. Peoples Telephone is the incumbent local exchange carrier and by NOFA

definition of broadband is neither unserved nor underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this area.

**Submitter:** Heartland Telecommunications Company of Iowa dba H

**Comment:** Heartland Telecommunications Company of Iowa dba HickoryTech ("Heartland") is the incumbent local exchange carrier in the exchanges of Boyden, Doon, Hawarden, Hull, Ireton, Rock Rapids and Sibley, all of which are within Applicant's proposed service area. Heartland makes digital subscriber line service available to over 80% of the households and businesses in these exchanges and has 45% take rate. Of those subscribers, 71% choose to subscribe at levels that meet the definition of broadband. Applicant's service area does not qualify as underserved.

**Submitter:** Premier Communications

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Sac County Mutual Telephone Company

**Comment:** We are responding to this application to make it known that we do have the ability to supply all of our customers within this application area with 3 meg Broadband. The customer base that we have are not using the faster speeds of broadband we have. We currently have DSL download speeds/upload speeds of 512/512, 1024/512, 1536/512, 3072/512. We currently have 5 customers with the 3 meg service. The majority of our customers with high speed internet are currently using our 512 speed (92%), with a few others using 1024 (3%), 1536 (4%) and 3072 (1%).

**Submitter:** Ayrshire Farmers Mutual Telephone

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Hills Telephone Company, Inc. dba Alliance Communi

**Comment:** Hills Telephone Company, Inc. dba Alliance Communications demonstrates that it provides broadband service throughout the areas of Larchwood and Inwood which are encompassed in the proposed funded Service Area in the Iowa Communications Network application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Alliance's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Alliance; 100% of the households in Alliance's service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** Northern Iowa Tel. Co. dba Premier Communications

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps portions of the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

**Submitter:** Palmer Mutual Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service.