Applicant Name: International Broadband Electric Communications

Public Notice Submissions

-----Service Area: IBEC Service Area 2 D

Submitter: Charter Communications

Comment: Charter Communications (‘Charter’), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant’s request in the proposed under-served and un-served service area would create an overlap in Charter’s service area. Charter’s response includes the necessary information to validate the overlapping condition as a result of this applicant’s request.

Submitter: CenturyLink

Comment: CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines.

CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. We attach a representative sample of areas where the application overlaps our existing broadband deployment. This data is not exhaustive; the application may include other areas also currently served with broadband by CenturyLink or other providers. We will provide additional information on request if that will further assist the agency’s review.

CenturyLink also provides data showing broadband availability in local telephone exchanges within the proposed service areas. This includes areas served by CenturyLink and/or other broadband providers. This data further shows the applicant would duplicate and overlap existing broadband services in the proposed service areas.
Submitter: NewWave Communications

Comment: NewWave currently serves multiple areas within this proposed area along with other providers. So, service is widely available. Percentage of Data Customers vs. Homes Passed: Greenville 20%; Vandalia 7%, Macoupin 7%, Montgomery 6% and St. Clair 20%. 3 MG or higher service is available to all. In addition, according to data compiled by the Media Business Corporation, an independent research firm, NewWave and its digital subscriber line competitors serve over 40% of homes passed in this particular market. As a result, this market is adequately serviced by NewWave and its competitors.

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

Submitter: Madison Communications

Comment: Madison Communications provides comments on this application regarding the underserved designation of the proposed funded area.

-----Service Area: IBEC Service Area 2 A

Submitter: Crockett Telephone Company, Inc.

Comment: Crockett Telephone Company, Inc. (CTC) is an existing RUS Traditional Telephone Borrower and since the early 1950’s has served as the existing Incumbent Local Exchange Company (ILEC) for 3 exchange areas within the rural counties of Crockett, Dyer, Gibson, Haywood, Lauderdale and Madison
in the State of Tennessee, portions of which are proposed to be served by International Broadband
Electric Communications in their ARRA Broadband Stimulus application.

CTC currently advertises and provides broadband services, at speeds up to 3 Mbps to residential and up
to 10 Gbps to business subscribers within the area proposed by this applicant. In addition, broadband
service, at speeds greatly in excess of the minimum broadband speed defined by the ARRA NOFA is
currently available through the CTC broadband network to approximately 86% of homes and businesses
within the CTC service territory. This is shown on Connected Tennessee’s Statewide Broadband
Inventory Map. The area proposed to be served by the applicant contains 46,945 households according
to the 2000 U.S. Census, of which 89 residential and business subscribers are already served by CTC. For
these reasons the applicant’s request for funding to overbuild areas already served by CTC should be
denied.

-----Service Area: IBEC Service Area 2 C

Submitter: Home Telephone Company

Comment: Home Telephone Company provides comments on this application regarding
the underserved designation of the proposed funded area.

Submitter: NewWave Communications

Comment: NewWave currently serves multiple areas within this proposed area along with other
providers. So, service is widely available. Percentage of data Customers vs. Homes Passed: Greenville
20%; Vandalia 7%, Macoupin 7%, Montgomery 6% and St. Clair 20%. 3 MG or higher service is available
to all. In addition, according to data compiled by the Media Business Corporation, an independent
research firm, NewWave and its digital subscriber line competitors serve over 40% of homes passed in
this particular market. As a result, this market is adequately serviced by NewWave and its competitors.

Submitter: Montrose Mutual Telephone Company, Inc.
Comment: Montrose Mutual Telephone Company, Inc. provides comments on this application regarding the underserved designation of the proposed funded area.

Submitter: Charter Communications

Comment: Charter Communications (‘Charter’), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant’s request in the proposed under-served and un-served service area would create an overlap in Charter’s service area. Charter’s response includes the necessary information to validate the overlapping condition as a result of this applicant’s request.

Submitter: Harrisonville Telephone Company

Comment: Harrisonville Telephone Company provides comments on this application regarding the underserved designation of the proposed funded area.

-----Service Area: IBEC Service Area 2 B

Submitter: MetroCast Communications of Mississippi, LLC

Comment: MetroCast Communications of Mississippi, LLC offers broadband service to approximately 70% of the applicant's proposed service area. MetroCast offers residential broadband transmission speeds in applicant's proposed service area up to 10Mbps downstream and 1Mbps upstream, with MetroCast’s most highly-subscribed broadband service having a transmission speed of 7.0Mbps downstream and 512kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 512kbps upstream, with advertised offerings of up to 15Mbps downstream and 3Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 9% of the households and businesses within the applicant's proposed service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including AT&T. According to an FCC report (http://www.fcc.gov/wcb/iatd/comp.html), as of June 30, 2008, 13 other companies reported providing high-speed service to this service area.

Based on the information provided above, applicant’s proposed service area certainly does not meet the definition of “unserved” or “underserved” as those two terms are defined in the NTIA/RUS NOFA.
MetroCast has invested millions of dollars of private capital to build advanced fiber optic networks to provide broadband services in the communities it serves, including the Cities of Booneville, Baldwyn, Thrasher, Jumpertown and Wheeler and other areas of Prentiss County which encompasses a material portion of the applicant’s proposed service area. Further details regarding the broadband services MetroCast provides in applicant's proposed service area are provided below.