Broadband USA Applications Database

**Applicant Name:** Satellite Broadband ARRA Application LLC

**Public Notice Submissions**

--- **Service Area:** WY_Fremont

**Submitter:** RT Communications

**Comment:** RT Communications, Inc. (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Fremont County and the communities of Shoshoni, Jeffery City and Gas Hills. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout our serving territory. 80% of RT customers in this service area including subscriber households and business locations are capable of receiving DSL speeds in excess of 768k downstream and 200k upstream. Approximately 45% of residential households subscribe to the DSL service that is in excess of 768k downstream and 200k upstream. This service area is neither unserved nor underserved as shown in the applicant's proposal.

**Submitter:** Dubois Telephone Exchange, Inc.

**Comment:** Dubois Telephone Exchange, Inc. (DTE) is an Independent Local Exchange Carrier (ILEC) serving 2,500 access lines in rural northwest and south-central WY, including the Fremont County communities of Dubois and Crowheart; and the Carbon County communities of Baggs, Dixon and Savery. DTE is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout its serving areas. 90-95% of DTE total serving area subscriber households and business locations are capable of 3mb DSL service today. Approximately 52% of DTE residential households in the proposed Satellite Broadband ARRA Application LLC (applicant) proposed funded service area already subscribe to 3mb or 1.5 mb service today. Beginning in 2010, DSL speeds 10mb or greater will be available to FTTH households and businesses. The applicant's proposed funded service area that overlaps DTE's service area in Fremont County, Wyoming is neither unserved nor underserved as represented in the applicant’s proposal.

--- **Service Area:** KS_Bourbon
Submitter: Craw-Kan Telephone Cooperative, Inc.

Comment: Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

-----Service Area: NV_Humboldt

Submitter: Humboldt Telephone Company

Comment: Humboldt Telephone Company is the local exchange carrier and provider of last resort in this area. Our service facilities extend to all residences and business establishments in our service area. Humboldt provides facilities-based, terrestrial broadband to our customers in Humboldt County covered by this application. Currently, broadband is available to approximately 75% of our business and residential customers, at minimum download speeds of 1.544 mbps and minimum upload speeds of 512 kbps.

-----Service Area: KS_Nemaha

Submitter: Rainbow Communications

Comment: Rainbow Telecommunications Association, Inc. dba Rainbow Communications is a phone, Internet, and cable TV service provider in rural northeast Kansas. The telecommunications company is headquartered in Everest, Kansas, and has been in existence since 1952. While Rainbow Telecommunications has offered high speed DSL- Internet for many years, the company has since expanded its service offerings in 2006 through a CLEC operation, Carson Communications dba Rainbow Communications. Rainbow Communications is able to provide high speed DSL, cable modem, and fiber-based Internet in many northeast Kansas rural communities. It is our goal to provide communication technology which rivals or surpasses those available in metro areas.
**Submitter:** Blue Valley Tele-Communications, Inc.

**Comment:** Blue Valley Tele-Communications, Inc. (BVTC) is a rural telephone cooperative that has been serving these remote and rural communities for over 50 years. BVTC was one of the first companies in the nation to offer High-Speed DSL to both in-town and rural customers no matter the distance from the central office. BVTC is also building for future applications and higher demands for broadband by investing in a fiber to the premise network that will reach 100% of its customers in their telephone exchanges, and was one of the first companies in the nation to attempt this type of network.

As a cooperative, BVTC services are driven by customer need and demand and customers are represented by a Board of Directors to make sure those needs are being met. The company also employs a full-time economic development director to assist in growth of their service areas. BVTC is proud to be known as an industry leader in the broadband arena, and plans to continue leading the way in broadband development in the future.

-----Service Area: OK_Murray

**Submitter:** Cable One, Ind.

**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: Chickasaw Telephone Company

Comment: Chickasaw Telephone Company has been offering broadband speed data service to subscribers through its subsidiary Bright Net Oklahoma for 11 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary, is served with high speed internet broadband service.

-----Service Area: KS_Riley

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 least ten years. Cox provides its customers in Kansas 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: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: NE_Burt

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.
Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and the present Broadband subscription take rate in this rural area is very near 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----Service Area:  AZ_La Paz

Submitter:  NPG Cable, Inc.

Comment:  NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

-----Service Area:  OK_Cotton

Submitter:  Pioneer Telephone Cooperative

Comment:  Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter:  Wichita Online Inc.
Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: TX_JeffDavis

Submitter: Big Bend Telephone Co.

Comment: Big Bend Telephone Comapany, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----Service Area: KS_Russell

Submitter: H&B Communications

Comment: H&B provides broadband speeds of up to 10Mbps to the entire Dorrance telephone exchange area.
Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or unserved as defined in the NOFA.

Submitter: Gorham Telephone Company

Comment: For the portion of this application that overlaps the Gorham Telephone Company serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Gorham Telephone Company offers a 3Mbps downstream service in this area. Lastly, Gorham Telephone Company supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: Wilson Telephone Co Inc dba Wilson Communications

Comment: Wilson Communications has been providing high quality and leading technology telecommunications services to rural Kansans for more than sixty years. Wilson Communications began offering high speed internet access service to our customers in the late 1990’s. We continued to expand our fiber network and now can provide broadband services to 100% of our customers. Wilson Communications continues to make investments in fiber optic facilities to ensure our customers have access to the latest broadband technology. We provide broadband to critical community anchor institutions including schools, rural health clinics, and public libraries. We are a full service provider of communications services and are able to bundle services offering discounts to our customers. Wilson Communications is a community based company, providing volunteerism, and other forms of support to each of the seven communities we serve.

-----Service Area: IA_Harrison

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: 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: 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 spectrums 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 that Satellite Broadband ARRA Application LLC has requested funds to build a network in Cass County Nebraska from the Broadband stimulus package. I wish to submit a dispute regarding the “underserved” designation of this area by Satellite Broadband ARRA Application LLC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both or organization to provide quality services.

-----Service Area: TX_Bosque

Submitter: CenturyLink
Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  MN_MilleLacs

Submitter:  Benton Cooperative Telephone Company

Comment:  Satellite Broadband ARRA Application LLC is proposing to overlap Benton Cooperative’s service areas of Bock, Foreston and the City of Milaca. These areas are currently capable of receiving high speed broadband access at speeds ranging from 768k to 5.0M down through Benton’s fiber network. As such, these areas are “SERVED” based on the definitions as established in the Notice of Funds Availability (NOFA). In the public notice response Benton is providing; 1) a map of the overlapping area Benton provides broadband services, 2) Benton’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.

-----Service Area:  IA_Osceola

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: Mediacom Communications Corporation

Comment: A large number of households in applicant's proposed service area are currently served by Mediacom. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant’s proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up 20 Mbps.

Submitter: Evertek, Inc

Comment: Evertek 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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Osceola for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Armstrong

Submitter: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Claude, Texas for which funds are being requested in this application, we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

-----Service Area: MN_Mahnomen
**Submitter:** Tekstar Communications

**Comment:** Tekstar Communications, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

**Submitter:** Garden Valley Telephone Company

**Comment:** Garden Valley Telephone Company ("GVTC"), a small rural operator and Rural Utilities Service ("RUS") Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application, LLC ("Satellite BB") proposed funded service area in the county of Mahnomen, MN. Satellite BB has proposed broadband service for this area and it is already served by GVTC.

**Submitter:** Twin Valley/Ulen Telephone, dba ACS

**Comment:** Twin Valley/Ulen Telephone, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

-----Service Area: TX_ValVerde

**Submitter:** Time Warner Cable Inc

**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:** Big Bend Telephone Co.
Comment: Big Bend Telephone Company, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----Service Area: TX_Scurry

Submitter: Stelera Wireless LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Snyder is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area: AZ_Apache

Submitter: TableTop Telephone Company

Comment: Table Top Telephone Company, Inc. believes the applicant for Broadband Stimulus Funding should be denied.

Submitter: Navajo Communications Company

Comment: A portion of the applicant's territory is already served by the respondent.

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.
Satellite Broadband (Sat) a satellite broadband provider, is a non-terrestrial based service provider. In their Satellite Broadband ARRA Application, LLC – Nowata filing, Sat has incorrectly filed for ARRA funding for an area that includes a portion of Totah Communications, Inc.’s (Totah) rural exchange area in Oklahoma. The area Sat proposes to serve that covers Totah territory in Oklahoma is Lenapah and Wann. Sat has incorrectly identified the areas of Lenapah as Underserved and Wann as Unserved. Sat is wrong in their assertion. Lenapah and Wann are already being served with broadband by Totah (Incumbent ILEC) throughout most of the area with speeds equal to or in excess of 768 kbps. In addition, the area is also currently being served by at least one wireless provider. In the limited Totah areas in which 768 kbps are not currently provided, Totah is still providing Internet access. Additionally, Totah has requested ARRA funds in order to upgrade those limited areas with speeds equal to or in excess of 3 Mbps.

We oppose Sat’s filing and their request for funds covering Lenapah and Wann in Oklahoma on the basis that they have incorrectly identified the Wann area as unserved and have indicated that Lenapah is underserved in its entirety; both of which are incorrect assertions. We recommend that the Sat application be rejected.

If you have any questions, or need additional information please do not hesitate to contact us.

Sincerely,

Keith E. Watson
Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.
CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter:  North-State Telephone

Comment:  Respondent provides Internet services to a portion of the Applicant’s overlapping proposed funded service area indicated on the attached map.

-----Service Area:  OK_Mayes

Submitter:  Grand Telephone Co. Inc

Comment:  The area in which the applicant Satellite Broadband ARRA Application LLC has filed a stimulus application defining an underserved area, a portion of Satellite Broadband ARRA Application LLC application area is currently served with Broadband by Grand Telephone. Over the last seven years Grand Telephone has made and maintained significant investments to provide 768 kbps broadband speeds to all establishments in its serving area. Grand Telephone advertises the availability of 3 Mb Broadband Speeds to all establishments within its Jay and Disney exchanges.

Submitter:  Salina Spavinaw Telephone Company, Inc.
**Comment:** The area that Salina Spavinaw Telephone Company, Inc. serves is neither underserved or unserved. We have purchased new equipment since June 30, 2009 that will enable our company to serve at least 90% of households in this service area. The service will be downloads of at least 768K and up to 3.0Mbps.

**Submitter:** Allegiance Communications, LLC

**Comment:** Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: CA_Modoc

**Submitter:** Citizens Telecommunications of California

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

-----Service Area: KS_Crawford

**Submitter:** Craw-Kan Telephone Cooperative, Inc.

**Comment:** Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in
the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

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 least ten years. Cox provides its customers in Kansas 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.

-----Service Area: WA_Kittitas

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.
CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

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: Qwest
Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Kittitas for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

Submitter: Ellensburg Telephone Company

Comment: Ellensburg Telephone Company (“Ellensburg”) is responding to this Public Notice Filing regarding Satellite Broadband ARRA Application LLC’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is located in Kittitas County, Washington. Ellensburg is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 97% of its service area as outlined in response area map in Kittitas County, Washington. For the proposed funded service area which overlaps with Ellensburg’s incumbent service area, the applicant claims that a portion is “unserved” and the remaining is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “unserved” and “underserved” is not true.

-----Service Area: NM_Lea

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency
officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (‘‘mbps’’) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Leaco Rural Telephone Cooperative Inc.

Comment: Leaco Rural Telephone Cooperative, Inc. has been offering broadband speed data service to subscribers for over 11 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served using wired and wireless high speed internet broadband service.

Submitter: PVT NetWorks, Inc.

Comment: PVT NetWorks, Inc. serves the Hobbs area of the Lea county map that has been overlapped by Satellite Broadband ARRA Application LLC. We are currently offering high speed internet with 700
MHz service. PVT NetWorks, Inc. is offering packages up to 3.0 Mbps. We have uploaded an advertisement showing our current speeds along with pricing.

Service Area: MT_Rosebud

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 51% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Satellite Broadband ARRA Application LLC’s application for broadband funds support in Rosebud County Montana, their comments that the areas are unserved or underserved are not true. We serve the majority of Rosebud County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.
Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA Application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Rosebud County. Range has 40 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area:  MO_Holt

Submitter:  Oregon Farmers Mutual Telephone Company

Comment:  This grant proposes to bring satellite broadband internet service to all or parts of 20 states. The vast majority of the locations covered by this grant already have broadband today and this grant doesn’t pay the slightest bit of attention to the grant rules. It characterizes these areas as underserved when in fact, A majority of the homes, businesses and anchor institutions within this footprint are already served with broadband today. This grant seems to assume that rural automatically means unserved and underserved, when in fact most of the proposed service area already has broadband.

For example, this grant request proposes to completely cover the service territory of Oregon Farmers Mutual Telephone Company. Oregon Farmers is an incumbent rural telephone company that has been serving this area for over 100 years. Oregon Farmers has been granted a franchised area to serve, and since it has been willing to serve a very poor and rural area also has been given a federal exemption against competition. Small rural areas like the one served by Oregon Farmers need a barrier against competition to ensure that people in the area can continue to get service for the next century. Oregon Farmers has kept rates low and has brought advanced services and broadband to this rural area when nobody else was willing to make investments in such an impoverished area.
The Oregon Farmers service territory is ‘served’ today using the definitions of the NOFA since the company has 1) more than a 40% broadband penetration, and 2) advertises broadband speeds of 3 Mbps.

Our knowledge of the telephone and cable industry tells us that this grant also proposes to bring broadband to many areas where AT&T, Qwest, various cable companies, and many other small telephone companies already provide broadband today.

This grant should be rejected in its entirety for not adhering to the grant guidelines for serving mostly unserved and underserved areas. We believe that the vast majority of residences and businesses covered by this proposed grant are ‘served’ with broadband using the definitions defined in the NOFA. This grant seems to think that rural equates to ‘underserved’ and ‘unserved’ as defined in the NOFA. This is not the case and the county seats, other towns, and most census designated areas within these 33 counties already have broadband today and are not eligible for grant funding. The NOFA allows using only a small portion of any grant to cover served areas, but this grant seeks to use grant money to bring broadband mostly to places that are defined as ‘served’ under the NOFA. Again, this grant request should be rejected.

There are other problems with this grant. One issue with satellite broadband is the availability of upload speeds. Broadband as defined by the FCC has two components that must be met in order to qualify as broadband – download speed and upload speed. Most residential satellite service today does not qualify as broadband because of the paltry upload speeds available to customers. Many customers must use dial-up links over a telephone line to complete the upload link, and using the very slow speeds of dial-up disqualifies such a service from being considered as broadband. Even links directly from customers to the satellite are usually of dial-up type speeds. Good upload speeds are essential for a service to be considered as broadband. These grants have the goal of promoting economic development in rural areas. This means bringing broadband to rural businesses, but also bringing decent broadband to homes so that people can work from home. Over 80% of the new jobs created in the last decade have been created by small businesses, and a very large percentage of those new jobs have been created by people working out of their homes. Satellite broadband does not provide the kind of broadband that allows somebody to work from their home. People typically buy satellite broadband when they have no alternative, but the technology and service are inferior to all other types of broadband technologies.

Satellite broadband also has another significant drawback that limits its usefulness for economic development. All of the residential and small business satellite products available today place a monthly cap on the amount of total bandwidth that a customer can use. For example, a customer might be limited to 5 gigabits of total bandwidth for downloading and uploading combined. For anybody who does anything greater than reading emails and light web browsing, this bandwidth cap greatly reduces the possibility of using the satellite service for conducting business or working from the home.

Another problem with satellite broadband is the cost to customers. The typical residential satellite service today costs around $70 per month while having paltry upload speeds and a cap on monthly usage. Federal grant funds should not be used to promote this kind of expensive and inferior product.
Another problem with the grant is the amount of funding they are seeking. This grant request is asking for 75% grant funding. Under the most liberal interpretation of the NOFA grant rules, this grant would be at best eligible for 50% grant funding since it covers both non-remote areas and non-rural areas. However, since it proposes to bring broadband to many served areas it ought to be rejected and get no grant funding.

While this is an interesting proposal, this project should not be funded. This one project seeks to get a very large percentage of all of the available grant money, and would use this money to create an inferior broadband product. This technology is flawed. Customers in these states today already have satellite broadband available to them and federal grant funds should not be used to subsidize a second entry into a market that uses inferior technology and that charges too high a price for broadband.

-----Service Area: IA_Taylor

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM’s territory is neither unserved nor underserved.

-----Service Area: WY_Carbon

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.
Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

**Submitter:** Inventive Wireless of Nebraska, LLC dba Vistabeam

**Comment:** Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

**Submitter:** Dubois Telephone Exchange, Inc.

**Comment:** Dubois Telephone Exchange, Inc. (DTE) is an Independent Local Exchange Carrier (ILEC) serving 2,500 access lines in rural northwest and south-central WY, including the Fremont County communities of Dubois and Crowheart; and the Carbon County communities of Baggs, Dixon and Savery. DTE is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout its serving areas. 90-95% of DTE total serving area subscriber households and business locations are capable of 3mb DSL service today. Approximately 57% of DTE residential households in the applicant’s proposed funded service area already subscribe to 3mb or 1.5 mb service today. Beginning in 2010, DSL speeds 10mb or greater will be available to FTTH households and businesses. The applicant’s proposed funded service area that overlaps DTE’s service area in Carbon County, Wyoming is not underserved as represented in the applicant’s proposal.
-----Service Area:  WY_Washakie

Submitter:  Bresnan Communications

Comment:  Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as RTC, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter:  RT Communications, Inc

Comment:  RT Communications, Inc. (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Washakie County and the town of Worland. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout our serving territory. 80 to 90% of RT customers in this service area including subscriber households and business locations are capable of receiving 3 mb DSL today. Approximately 44% of residential households subscribe to the DSL service that is in excess of 768k downstream and 200k upstream. Beginning in 2010, DSL speeds of 10 mbs or greater will be available to FTTH households and businesses. RT’s service area is neither unserved or underserved as shown in the applicant’s proposal.
-----Service Area:  OK_Tillman

Submitter:  Pioneer Telephone Cooperative

Comment:  Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area:  TX_Navarro

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our
data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: OK_Adair

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service
(meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

**Submitter:** Salina Spavinaw Telephone Company, Inc.

**Comment:** The area that Salina Spavinaw Telephone Company, Inc. serves is neither underserved or unserved. We have purchased new equipment since June 30, 2009 that will enable our company to serve at least 90% of households in this service area. The service will downloads of at least 768K and up to 3.0Mbps.
----Service Area: NE_Douglas

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 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.

-----Service Area: TX_Limestone

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  OK_Seminole

Submitter:  Pottawatomie Telephone Company

Comment:  Pottawatomie Telephone Company through its subsidiary, Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Pottawatomie serves.
Submitter: WaveDivision Holdings, LLC

Comment: WaveDivision Holdings, LLC ("Wave") is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC ("Applicant") for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.

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: Dobson Telephone Company

Comment: Our serving area may cross this one.

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with
high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area: SD_Brown

Submitter: James Valley Cooperative Telephone Co & NVC

Comment: James Valley Cooperative Telephone Company and Northern Valley Communications, LLC demonstrate that they provide broadband service throughout Brown County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in JV & NVC’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 JV & NVC; 100% of the households in JV & NVC’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; JV & NVC 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.

-----Service Area: AZ_Yuma

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Yuma for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.
-----Service Area: MN_Itasca

Submitter: Peoples Telephone Co of Bigfrok, dba ACS

Comment: Peoples Telephone, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: CO_Dolores

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our
average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  WA_Pacific

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.
CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

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 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: Wahkiakum West Television Inc., dba Wahkiakum West
Comment: The Applicant has applied for funds to serve an area that is neither “unserved” nor “underserved.”

Wahkiakum West Television, Inc., dba Wahkiakum West Internet, for and on behalf of itself and its affiliate, Western Wahkiakum County Telephone Company, (collectively, the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Pacific County, Washington (“Pacific County”). The Company’s broadband service area includes a portion of Pacific County. Although the Application depicts and describes the portion of Pacific County that is encompassed by the Company’s broadband service area as “underserved,” that proposed funded service area is not “underserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Pacific County.

Service Area: ND_McLean

Submitter: Reservation Telephone Cooperative

Comment: The applicant contends the Proposed Funded Service Area (McLean County), which overlays an RTC service area, is unserved/underserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is underserved/unserved and has concluded it is not. According to RTC’s analysis, over 100 percent of the residential households in the service area have access to broadband service, as defined in the NOFA, and are capable of being served. Of those households capable of being served, the broadband penetration rate is over 38 percent for the 3 Mbps service area drawn and 57% for the entire exchange overlap areas. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps throughout the service area, including in the area newspapers and magazines, direct mail and area radio stations.

RTC has or is also completed FTTH to portions of the area by the end of this year. Adding the capabilities of higher speeds, video services and expanding the area served with high quality FTTH capable of 1000 Mbps.
Submitter: BEK Communications Cooperative

Comment: Satellite Broadband ARRA’s proposed project covers exchanges served by BEK Communications Cooperative. BEK currently serves all its exchanges by an existing fiber network that extends from our corporate headquarters in Steele, ND. In this public notice response BEK is providing; 1) a map of the overlapping area where BEK provides broadband services, 2) BEK’s DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from BEK within its service territory, 4) the number of residential households and business establishments subscribing to BEK’s broadband service within the proposed service area, 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: SRT Communications Inc

Comment: The Applicant has applied for Broadband Stimulus Support in areas (Cities/Townships/Census Blocks) indentified below in the SRT Communications Inc. Service Area that do not qualify as unserved or underserved. SRT Communications Inc. provides 4 Mbps and 8 Mbps in those areas:

Butte City

------Service Area: MT_Sheridan

Submitter: Nemont Telephone Cooperative, Inc.

Comment: The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is not aware of broadband services provided by others in the area. This funded service area has been defined as 'unserved' when Nemont can demonstrate that, not only is the designation of "unserved" not applicable, this area does not qualify as 'underserved'. The
services that Nemont offers and provides in this proposed funded service area far exceed the thresholds set of more than 10% of households having access to broadband service (as defined in the NOFA).

-----Service Area:  MT_Broadwater

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area

-----Service Area:  TX_Hale

Submitter:  NTS Communications, Inc.

Comment:  NTS Communications, Inc. is currently providing Broadband Services greater than 3 mbps in the community of Plainview, TX.

Submitter:  KeyOn Communications

Comment:  KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area:  WA_Whitman
Submitter: Pioneer Communications Company

Comment: Pioneer Communications Company, for and on behalf of itself and its affiliate, Pioneer Telephone Company (the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Whitman County, Washington (“Whitman County”). The Company’s broadband service area includes a portion of Whitman County. Although the Application depicts and describes the portion of Whitman County that is encompassed by the Company’s broadband service area as either “unserved” nor “underserved,” that proposed funded service area is not “unserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Whitman County as “unserved.”

Submitter: St. John Cooperative Telephone and Telegraph Co.

Comment: The St. John Cooperative Telephone and Telegraph Company has no "unserved" or "underserved" areas in its exchange area.

-----Service Area: ID_Madison

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.

------Service Area:  MT_Lake

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.
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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has
proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: CO_Phillips

Submitter: Phillips County Communication dba PC Telcom

Comment: Phillips County Telephone Company (PCTC) is a small, progressive, cooperative Rural Local Exchange Carrier (RLEC) located in Holyoke, Colorado. PCTC and its subsidiaries, Phillips County Communications, LLC (PCC, LLC) and PC Telcorp, Inc. (Telcorp) provide broadband Internet access ranging from 512 kbps down to 3 Mbps down to the entire service area for PCTC as well as the neighboring rural communities of Fleming, Haxtun, Julesburg, and Ovid, Colorado. All three entities are doing business as PC Telcom. Overall, greater than sixty percent of PC Telcom’s customers subscribe to speeds of 768 kbps down or greater. PC Telcom is one of the largest employers in northeastern Colorado and projects increasing its staff at an annual rate of two percent.

In keeping with its long tradition of providing cutting-edge technologies and after substantial investments in network infrastructure and facilities, one hundred percent of PC Telcom’s customers can enjoy broadband access. PC Telcom utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. These include Fiber to the Premise (FTTP), DSL, cable modem and unlicensed wireless.

PC Telcom provides broadband and Ethernet services to most anchor tenants in the communities within its service areas. These entities include all secondary schools; all County Government offices; hospitals and other health care facilities; and large businesses. In addition to Internet access at broadband speeds, PC Telcom also provides state-of-the-art Ethernet services to business customers at affordable rates.

PC Telcom has been the technology leader in northeast Colorado for its one hundred plus years of existence and is looking forward to continuing its excellent customer service record. PC Telcom was one of the first broadband providers in northeast Colorado and now relies on 10 years of experience
delivering services to difficult to serve areas that larger providers ignore. PC Telcom is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and support and local offices. It serves from a local perspective because PC Telcom’s owners, who are its customers, have a personal stake in the communities where they work and live.

Submitter: PC Telcorp dba PC Telcom

Comment: Phillips County Telephone Company (PCTC) is a small, progressive, cooperative Rural Local Exchange Carrier (RLEC) located in Holyoke, Colorado. PCTC and its subsidiaries, Phillips County Communications, LLC (PCC, LLC) and PC Telcorp, Inc. (Telcorp) provide broadband Internet access ranging from 512 kbps down to 3 Mbps down to the entire service area for PCTC as well as the neighboring rural communities of Fleming, Haxtun, Julesburg, and Ovid, Colorado. All three entities are doing business as PC Telcom. Overall, greater than sixty percent of PC Telcom’s customers subscribe to speeds of 768 kbps down or greater. PC Telcom is one of the largest employers in northeastern Colorado and projects increasing its staff at an annual rate of two percent.

In keeping with its long tradition of providing cutting-edge technologies and after substantial investments in network infrastructure and facilities, one hundred percent of PC Telcom’s customers can enjoy broadband access. PC Telcom utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. These include Fiber to the Premise (FTTP), DSL, cable modem and unlicensed wireless.

PC Telcom provides broadband and Ethernet services to most anchor tenants in the communities within its service areas. These entities include all secondary schools; all County Government offices; hospitals and other health care facilities; and large businesses. In addition to Internet access at broadband speeds, PC Telcom also provides state-of-the-art Ethernet services to business customers at affordable rates.

PC Telcom has been the technology leader in northeast Colorado for its one hundred plus years of existence and is looking forward to continuing its excellent customer service record. PC Telcom was one of the first broadband providers in northeast Colorado and now relies on 10 years of experience delivering services to difficult to serve areas that larger providers ignore. PC Telcom is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and support and local offices. It serves from a local perspective because PC Telcom’s owners, who are its customers, have a personal stake in the communities where they work and live.
Submitter:  Haxtun Telephone Co.

Comment:  Haxtun Telephone Company demonstrates that the application filed by Satellite Broadband ARRA Application LLC is incorrect in its claim that the area it proposes to serve which overlaps Haxtun Telephone’s service area is unserved.  Further, Haxtun Telephone demonstrates that the area Satellite Broadband ARRA Application LLC proposes to serve which overlaps Haxtun Telephone’s service area does not meet all of the criteria which categorize an area as underserved.

As demonstrated, 60% of households in Haxtun Telephone’s service area, including those areas which are part of Satellite Broadband ARRA Application LLC’s proposed funded 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 Haxtun Telephone.  Therefore Satellite Broadband ARRA Application LLC’s claim that this overlapping area is unserved is incorrect.  Further, no part of this overlapping area is underserved on the basis of access to broadband service.  In addition, Haxtun Telephone demonstrates that the rate of broadband subscribership for households in [the part of the proposed funded service area which overlaps Haxtun Telephone’s service area] [its service area] is significant.

-----Service Area:  OK_Love

Submitter:  Chickasaw Telephone Company

Comment:  Chickasaw Telephone Company has been offering broadband speed data service to subscribers through its subsidiary Bright Net Oklahoma for 11 years.  The area applied for by the ARRA applicant, which falls within the telephone exchange boundary, is served with high speed internet broadband service.
-----Service Area: NE_Clay

**Submitter:** Glenwood Telecommunications Inc.

**Comment:** Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

**Submitter:** Hamilton.net, Inc.

**Comment:** All residents and businesses within this service area have had access to broadband DSL services for several years. The number of businesses listed within the zip code(s) associated with our response are severely skewed and cannot be used for any legitimate analysis.

-----Service Area: KS_Geary

**Submitter:** The Tri-County Telephone Association, Inc.

**Comment:** The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves
from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: CO_Kiowa

Submitter: Eastern Slope Rural Telephone Association, Inc.

Comment: Eastern Slope Rural Telephone Association, Inc. (ESRTA) has been providing high-quality communications services to rural eastern Colorado for 57 years. Based on our history of serving difficult-to-serve areas that larger providers ignore, ESRTA is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work. To this end, ESRTA is capable of providing broadband services at speeds exceeding 5 Mbps download.
ERSTA is a local company that provides much-needed jobs, 24-7 customer service and local offices. ERSTA is proud to count among its broadband customers community anchor institutions including schools, hospitals, local government offices and public safety agencies. It serves from a local perspective because ERSTA’s owners, who are also its customers, have a personal stake in the communities where they work and live.

-----Service Area: TX_Lamb

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: NE_Buffalo

Submitter: ATCjet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.
The respondent’s overlap area of applicant’s PFSA contains 2,334 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

Submitter: Hamilton.net, Inc.

Comment: Hamilton.net just began offering stationary unmetered broadband services using 3G 1XEVDO/Rev A in this location. Our brand name for this service is "GMAX”. This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service. Additionally, Hamilton.net has also been offering broadband services using 5700 MHz unlicensed wireless equipment in a portion of this area for several years.

-----Service Area: IA_Union

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: OK_Logan
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 least ten years. Cox provides its customers in Oklahoma 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: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area: SD_Yankton

Submitter: Knology, Inc.

Comment: Knology is making broadband services available to approximately 5% of areas designated as "Underserved" and to approximately 26% of areas designated as “Unserved” in the Satellite Broadband proposed funded service area (PFSA) in Yankton County, South Dakota. Satellite Broadband may not be meeting the definition of “Underserved” because Knology, along with other service providers, may be providing existing broadband services to more than 40% of the households in the PFSA. Knology, along with other service providers in the area, may also be making broadband service available to more than 50% of the PFSA. Furthermore, Knology is advertising broadband service exceeding 3 mbps in underserved areas of the Satellite Broadband proposed funded service area.

Information regarding Knology’s subscriber penetration and plans for upgrade are provided in the comments section.

Submitter: HANSON COMMUNICATIONS

Comment: Ft. Randall Telephone Company (“Company”), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the areas East of Tabor and
West of Viborg, SD which covers a portion of the proposed funded service area ("Area") since 1996 after acquiring them from Qwest. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion the area is either unserved or underserved. At no time did the Applicant contact us to determine areas that presently have broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 83% of our end users in this area and of those 100% all are above the NOFA defined broadband speeds for unserved areas.

-----Service Area:  KS_Thomas

Submitter:  Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment:  Rural Telephone Service Co., Inc., an RUS borrower since 1952, offers broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

-----Service Area:  TX_Clay

Submitter:  Community Telephone Co. / Comcell

Comment:  Community Telephone Company provides this response to the Satellite Broadband Clay County. Community offers broadband service availability to 95% of the overlapping portion of the PFSA as Projected by Satellite. Because it provides such availability, the Community overlap in a portion of the PFSA should not be eligible for the underserved designation.

Submitter:  KeyOn Communications

Comment:  KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.
Comment: Whidbey Telephone Company dba Whidbey Telecom (the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Island County, Washington (“Island County”). The Company’s broadband service area includes a significant portion of Island County. The portion of Island County that is encompassed by the Company’s broadband service area is neither “unserved” nor “underserved,” and the Application does not depict or describe it as either “unserved” or “underserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Island County. In addition, the Company opposes the Application to the extent that the proposed funded service area proposed in the Application includes any portion of Island County, on the grounds that the Application does not allege that any portion of the proposed funded service area of Island County is either “unserved” or “underserved.”

Comment: WaveDivision Holdings, LLC (“Wave”) is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC (“Applicant”) for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.
**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 Greene County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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:** 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 funded Service Area in the Satellite Broadband 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.
Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 90-95% overlap of its coverage with the PFSA based on households served.

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:** Direct Communications Cable

**Comment:** Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain service areas. It appears that Satellite Broadband ARRA’s application overlaps the company’s area of service that includes the community of Aberdeen and DCC believes that this area of service is neither unserved or underserved in broadband services.

-----Service Area: MT_Flathead

**Submitter:** CenturyLink

**Comment:** The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.
Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Century Tel, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

-----Service Area: MT_Gallatin

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.
Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

**Submitter:** 3 Rivers Telephone Cooperative, Inc.

**Comment:** This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.
-----Service Area:  NE_Howard

Submitter:  Nebraska Central Telephone Co.

Comment:  The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 661 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

Submitter:  Hamilton.net, Inc.

Comment:  Hamilton.net just began offering stationary unmetered broadband services using 3G 1XEVDO/Rev A in this location. Our brand name for this service is "GMAX". This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service.

-----Service Area:  OK_Stephens

Submitter:  Cable One, Inc.
Comment: Satellite Broadband ARRA Application LLC Stephens County, Duncan, Oklahoma and surrounding areas.

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:** Pioneer Telephone Cooperative

**Comment:** Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

**Submitter:** Wichita Online Inc.

**Comment:** Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----**Service Area:** NE_Boyd

**Submitter:** Three River Telco

**Comment:** Three River Telco currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a “Served” area. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of
Broadband services in the application area at a speed of 768/200 Kbps or higher is 40% of households. Three River Telco offers an 8 Mbps service.

**Submitter:** Northeast Nebraska Telephone Company

**Comment:** Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is equal to 40% and growing.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----**Service Area:** TX_Tarrant

**Submitter:** Time Warner Cable Inc

**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: North Texas Broadband

Comment: North Texas Broadband (NTBB) currently provides a wide array of broadband offerings within the proposed funded service area. NTBB has been offering broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. NTBB’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through NTBB, but several ILEC’s, Wireless companies, and numerous mobile broadband service providers offer several choices to the subscriber. NTBB’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----Service Area: SD_McPherson

Submitter: Valley Telecommunications Coop

Comment: Valley Telecommunications Cooperative (Valley) 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. Valley is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. In the area of overlap, greater than 50% of households have access to facilities-based broadband service and the rate of broadband subscribership for residential households and business
establishments exceeds 40%. Valley also advertises broadband transmission speeds of at least 3 Mbps downstream within the area of overlap.

-----Service Area: NE_Nemaha

Submitter: Southeast Nebraska Communications

Comment: Southeast Nebraska Communications (SNC) provides standard high speed broadband internet service with download speeds up to 3 Mbps for an affordable rate of $39.95/month; and offer download speeds of up to 5 Mbps. SNC offers internet access to 100% of the households in its service territory; and it has a subscriber rate of over 40% of households. There are no installation fees or contracts to sign for SNC's fast and reliable broadband service.

Submitter: Jagwireless

Comment: To Whom It May Concern: Hello, my name is Danny Olsen and I am writing this on behalf of my employer, jagWIRELESS. jagWIRELESS specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrums 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 50 tower sites. In the areas we provide service we often compete with wire-line 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 that Satellite Broadband ARRA Application LLC has requested funds to build a network in Cass County, NE. from the Broadband stimulus program. I wish to submit a dispute regarding the “underserved” designation of this area by Satellite Broadband ARRA Application LLC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both or organization to provide quality services. The areas which Satellite Broadband ARRA Application LLC intends to provide service already have 2 or more local providers and can also receive mobile broadband services from various national mobile providers. This area does not need additional broadband competition as it is well served by private organizations who have invested private dollars to services the broadband needs of the area residents. Underserved Criteria – Advertised Speeds Our wire-line competitor offers speeds of 6 Mbps in each of these service areas and Loganet offers speeds of 3 Mbps in each of the service areas. Attached is an advertisement showing that we do advertise these speeds which AlphaStar would like to service. Penetration Rate Our organization does regular marketing by multiple methods and we
occasionally trade customers with the DSL carrier but we are most after the new residents to the area who are newly choosing between multiple carriers. Our organization has been offering services in this market for 7 years. Based on our marketing and survey’s we find that market penetration between our services and those competing with us is well into the 60% range. The remaining 40% of households simply do not want or cannot afford any of the competing service providers, who offer services as low as $25/mo.

-----Service Area:  OK_Woodward

Submitter:  Pioneer Telephone Cooperative

Comment:  Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter:  Dobsont Telephone Company

Comment:  Dobson Telephone Company challenges the application of Satellite Broadband ARRA Application LLC based on their declaration of the serving area being underserved.

-----Service Area:  TX_Hockley

Submitter:  NTS Telephone Company, LLC

Comment:  NTS Telephone Company, LLC is providing Broadband Services, beginning at 8 mbps download speed, to the residents of Levelland and Smyer, TX via a Fiber to the User network. The United States Department of Agriculture, Rural Utilities Service funded the overbuild of these two communities under RUS Broadband Loan TX 1112-A.
Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: WY_ Uinta

Submitter: All West Communications

Comment: All West Communications provides broadband DSL and Ethernet services to Evanston, Bear River and Woodruff.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: SD_Sully

Submitter: Venture Communications Cooperative

Comment: Venture Communications Cooperative demonstrates that it provides broadband service throughout Sully County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.
As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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.

-----Service Area: CO_LaPlata

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.
Submitter: Velocitynet LLC

Comment: VelocityNet, hereby, respectfully opposes and objects to this and all applications being considered for Broadband competitors applying for BIP or BTOP funding to expand into our existing rural markets of La Plata County and Montezuma County, Colorado.

These two counties are neither “unserved” nor “underserved” as defined by BIP and BTOP, and should not be eligible for any BIP or BTOP funding.

VelocityNet LLC has been providing and advertising 3Mb of high-speed broadband, wireless Internet services in Montezuma County and La Plata County in Colorado for over six years.

In addition to VelocityNet, there are six other Broadband companies, already providing and advertising high-speed, broadband services in Montezuma County and La Plata County, Colorado.

Qwest provides DSL in Cortez, Durango & Mancos;
CenturyTel has DSL in Dolores, Lewis, and Arriola;
Baja has cable broadband in Cortez;
Farmers Telephone Company has broadband service in rural Montezuma County;
Brainstorm has DSL and High-speed Wireless service in rural La Plata County;
Mydurango.net also has service in rural La Plata County.

VelocityNet has grown, and prefers to grow, the old-fashion way...through hard-work and reinvesting profits... without relying on grants, loans or other outside financing. If BIP or BTOP provide grants and/or loans for the markets we serve, they would give an undeserved, “Government-funded financial advantage” to our competitors, and that would be completely unfair in our American free-market economy.

Therefore, as one of numerous incumbent broadband Internet service providers serving these two counties, we respectfully request that this and all existing and/or future applications for Montezuma County and La Plata County in Colorado be denied.
Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Durango will be served by Stelera Broadband a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as underserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband LaPlata for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

Service Area: TX_Cottle

Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: Cottle County Texas is being labeled as an Unserved rural area. We challenge this position regarding Cottle County Texas labeled as an unserved location.

As the Incumbent Local Exchange Carrier in this rural area (see map) we provide landline and broadband service offerings throughout locations of Cottle County Texas. Equally as important the rural areas are sparsely populated and providing these services is challenging. The community of Paducah, Texas is the lone populated community in Cottle County Texas. Cap Rock Telephone Cooperative, Inc. has and will continue to invest in providing services to customers in rural Texas including Cottle County Texas.
Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Cottle county rural area. Competition exists with a limited number of potential customers in this area. Satellite service providers, cable broadband service providers and wireless broadband opportunities are available to a number of residential and businesses located in Cottle County Texas. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: MN_Douglas

Submitter: Park Region Mutual Telephone Company

Comment: The applicant incorrectly claims the area served by our company as unserved and underserved. 100% of the establishments in our serving territory have access to facilities-based, terrestrial 3Mb plus internet. The rate of broadband subscribership within the area represented in the map is 75%.

Submitter: Runestone Telephone Association

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Kensington exchange in Douglas County that is currently served by Runestone Telephone Association. We currently serve the exchange by an existing copper / fiber-to-the-home network. In the public notice response Runestone Telephone Association is providing; 1) a map of the overlapping area Runestone provides broadband services, 2) Runestone'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: Midwest Telephone Company, dba ACS

Comment: Midwest Telephone, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and
the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

Submitter: diversiCOM- Wisper Wireless

Comment: In mid 2005 we created a company, Wisper Wireless to invest in rural areas using wireless technologies where little or no broadband service was available. Today we are using wireless cutting edge (WiMAX) technology to deliver these services. Initial and ongoing investment dollars are significant. Further, there is a limited amount of households in these markets to support this effort or that are requesting service. As part of this effort we also provide internet classes to our customers to educate them on the basic of internet, web browsing and email. Due to the low population densities we believe sustainable adoption is a more vital tool then putting more providers to cover the same area.

Submitter: Osakis Telephone Company

Comment: Osakis Telephone, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

-----Service Area: OK_Dewey

Submitter: Dobson Telephone Company

Comment: Dobson Telephone Company challenges the application of Satelite Broadband ARRA Application LLC based on their declaration of the serving area being unserved/underserved.

Submitter: Dobson Telephone company

Comment: this is our area

Submitter: Pioneer Telephone Cooperative
Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area: TX_Grayson

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: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC's service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: TV Cable of Grayson County

Comment: Grayson County Cable (GCC) currently provides a wide array of broadband offerings within the proposed funded service area. GCC has been offering broadband services in excess of the 3 MB
bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. GCC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through GCC, but several ILEC’s, Wireless companies, and numerous mobile broadband service providers offer several choices to the subscriber. GCC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

------Service Area: WA_Skagit

Submitter: WaveDivision Holdings, LLC

Comment: WaveDivision Holdings, LLC (“Wave”) is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC (“Applicant”) for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.
Service Area: KS_Saline

Submitter: The Tri-County Telephone Association, Inc.

Comment: The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

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 least ten years. Cox provides its customers in Kansas 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: Home Communications, Inc.

Comment: For the portion of this application that overlaps the Home Communications, Inc. serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Home Communications, Inc. offers a 3Mbps downstream and 5Mbps downstream service in this area. Lastly, Home Communications, Inc. supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

Submitter: Wilson Telephone Co Inc dba Wilson Communications

Comment: Wilson Communications has been providing high quality and leading technology telecommunications services to rural Kansans for more than sixty years. Wilson Communications began offering high speed internet access service to our customers in the late 1990’s. We continued to expand our fiber network and now can provide broadband services to 100% of our customers. Wilson Communications continues to make investments in fiber optic facilities to ensure our customers have access to the latest broadband technology. We provide broadband to critical community anchor institutions including schools, rural health clinics, and public libraries. We are a full service provider of communications services and are able to bundle services offering discounts to our customers. Wilson Communications is a community based company, providing volunteerism, and other forms of support to each of the seven communities we serve.

-----Service Area: KS_Reno

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 least ten years. Cox provides its customers in Kansas 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:  KanOkla Networks

Comment:  KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

Submitter:  KeyOn Communications

Comment:  KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area:  MN_Polk

Submitter:  Garden Valley Telephone Company

Comment:  Garden Valley Telephone Company ("GVTC"), a small rural operator and Rural Utilities Service ("RUS") Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application, LLC ("Satellite BB") proposed funded service area in the county of Polk, MN. Satellite BB has proposed broadband service for this area and it is already served by GVTC.

-----Service Area:  ND_Hettinger

Submitter:  Consolidated Telcom

Comment:  Consolidated Telcom service territory overlaps approximately 98% of the Satellite Broadband Application LLC Hettinger proposed funded service area (PFSA). Satellite Broadband Application LLC Hettinger designates this area as underserved. In the overlapping area, Consolidated
service advertises 20 meg service. The penetration for Consolidated alone is reasonable in the area so when combined with other providers the total penetration maybe over 40%.

-----Service Area:  OK_Washington

Submitter:  Totah Communications, Inc.

Comment:  Totah Communications, Inc.

OMB Control Number: 0660-0031

OMB Control Number: 0572-0142

Satellite Broadband (Sat) a satellite broadband provider, which is a non-terrestrial based service provider, in their Satellite Broadband ARRA Application, LLC – Washington filing has incorrectly filed for ARRA funding for areas that include a portion of Totah Communications, Inc.’s (Totah) rural exchange area in Oklahoma. The areas Sat proposes to serve that covers Totah territory in Oklahoma are Ochelata, a portion of Oglesby and a portion of Wann. Sat has incorrectly identified all of these areas as underserved. Sat is wrong in their assertion. Oglesby is being served in it’s entirety by Totah with speeds equal to or in excess of 768 bps. In addition the exchanges of Ochelata, Talala and Wann only have limited portions that are not already being served with broadband by Totah with speeds equal to or in excess of 768 bps. In the limited areas in which 768 bps are not currently provided, Totah is still providing internet access. Additionally, Totah has requested ARRA funds in order to upgrade those limited areas with speeds equal to or in excess of 3 Mbps.

We oppose Sat’s blanket filing and their request for funds covering Ochelata, Oglesby, and Wann in Oklahoma on the basis that they have incorrectly identified the entire areas as underserved which is an incorrect assertion. We recommend that the Sat application be rejected.

If you have any questions, or need additional information please do not hesitate to contact us.

Sincerely,
Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribeship for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”
-----Service Area: SD_Lyman

Submitter: Midstate Communications, Inc.

Comment: We serve this area and offer 3 mg broadband service.

Submitter: Kennebec Telephone Co., Inc.

Comment: Kennebec Telephone Co., Inc. (KTC) offers broadband speeds of 1.5 Mbps and 3 Mbps throughout the area where the applicant's PFSA overlaps our service territory. KTC has provided information regarding the number of residential households and business establishments capable of receiving broadband in the area of overlap, and has also provided information regarding the number of existing customers purchasing broadband service in this area. In the area of overlap, greater than 50% of households have access to facilities-based broadband service and the rate of broadband subscribership exceeds 40%. Therefore, according to the terms and definitions provided, this area of overlap is neither unserved nor underserved.

-----Service Area: TX_Nolan

Submitter: Taylor Telephone Cooperative, Inc.

Comment: The proposed funded services area of Satellite Broadband located in Nolan, TX, Nolan County does not meet the criteria for underserved because Taylor Telephone Cooperative provides up to 6 Meg service in 90% of the PFSA. Although Taylor does not cover the entire PFSA the 46 premise coverage disqualifies the entire area with a 30% penetration rate.

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Sweetwater is served by Stelera Broadband, a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps.
downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area: CO_Costilla

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Blanca Telephone Company

Comment: As the NTIA begins their process of reviewing and awarding grants, it is important that they take into consideration the capabilities of the existing providers like BTC. BTC fully supports helping to fund truly un-served or under-served areas. However, many of the applications propose to overbuild
existing facilities which results in an unnecessary duplication of service. This may be the case for BTC should some of these grants be approved in our service territory.

The Blanca Telephone Company, BTC, a family owned telephone company, has been providing telephone service to the North Costilla County and Eastern Alamosa County since 1922. The Blanca Telephone Company has a local office and hires local people. The staff has grown from 1 to over 13 individuals. BTC has always had the mindset that the members of the counties and communities it serves need advanced services much more than the people in the city, because rural Americas must travel miles and miles to the nearest information source, while those in the city can walk across the street.

Therefore, BTC started installing fiber in 1994. Today the Blanca Telephone Company has provided over 20% of its customers with fiber to the home and by the end of 2010, over 50% of the customers in the BTC service area will have access to high speed data at a minimum of 30 Mbps. By the end of 2012 all of the customers in the service area will have access to over 30 Mbps.

The BTC also furnishes high speed EVDO wireless in Costilla and Conejos Counties. The EVDO system offers 3 Mbps down and 1 Mbps up.

This appears to be a duplicate facility and is not necessary.

Submitter: Blanca Telephone Company

Comment: Broadband service of at least 3 mbps in the subject grant area is already advertized and provisioned. Accordingly, the area is neither "underserved" nor "unserved" as defined by the NOFA. It is uneconomic for stimulus money to be used to overbuild existing broadband services. The NOFA seeks irrelevant information, fails to apply the standard required by the ARRA, requires commenters to provide information without first publishing those requirements and procedures in the Federal Register, and awards stimulus grants based upon “presumptions” which are not found in the ARRA.

-----Service Area: KS_Ellis
Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

Submitter: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Submitter: Gorham Telephone Company
**Comment:** For the portion of this application that overlaps the Gorham Telephone Company serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Gorham Telephone Company offers a 3Mbps downstream service in this area. Lastly, Gorham Telephone Company supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

-----Service Area: KS_Pawnee

**Submitter:** GBT Communications

**Comment:** Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.
-----Service Area: SD_Butte

Submitter: West River Telephone Cooperative Company

Comment: West River Telephone Cooperative Company demonstrates that it provides broadband service throughout Butte County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in West River’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 West River; 100% of the households in West River’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 subscriership for the proposed funded Service Area is greater than 40 percent of households.

Submitter: Qwesr

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Butte for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: WA_Jefferson

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.
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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband Jefferson 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: SD_Minnehaha

Submitter: Alliance Communications Cooperative, Inc.

Comment: Alliance Communications Cooperative, Inc. demonstrates that it provides broadband service throughout Brandon, Garretson, Crooks, Baltic and Valley Springs areas which are encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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; Alliance 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.
Service Area: OK_Kiowa

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: Carnegie Telephone Company

Comment: Carnegie Telephone Company provides DSL to 100% of the Carnegie and Alfalfa exchanges at speeds of at least 3mbps. The subscribership of the areas is greater than 40% of households.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum
broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second ("mbps") downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area:  IA_Boone

**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:** 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 Satellite Broadband ARRA Application LLC 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:** 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: CO_Pueblo

**Submitter:** CenturyLink

**Comment:** CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

**Submitter:** Rye Telephone Company

**Comment:** Rye Telephone Company (RTC) has been providing high-quality communications services in the remote and rural communities of Rye, Colorado City and Kim, Colorado for 50 years. RTC has been offering broadband services since 2002 and can offer speeds up to 5 Mbps within its service areas.
In keeping with its long tradition of providing cutting-edge technologies, RTC utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. At considerable investment, RTC deployed a Fiber-to-the-Premise (FTTP) platform to serve the vast majority of its service areas.

RTC is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Because of RTC’s advanced network, important community anchor institutions including local and state government, public safety agencies, healthcare facilities, schools and libraries now have broadband services. Due to RTC’s entrepreneurial spirit, its dedication to its customers and through a substantial investment in advanced network facilities, these rural southern Colorado communities enjoy the same level of service as offered in metropolitan areas.

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Colorado City will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

Submitter: Beulahland Communications, Inc.

Comment: Beulahland Communications, Inc., is a community based wireline provider of broadband services, that has been providing state-of-the-art telecommunication services to the rural portions of western Pueblo and southeastern Custer counties of southeast Colorado for over 50 years. Beulahland and its common controlled local telephone company employs 10 local people and is one of the largest employers in our community. Today, broadband speeds in excess of 768Kbs down and 512K up are available to 99% of customers in the service area mapped, including governmental and educational entities. The companies are presently in the process of a broadband network buildout that will provide broadband speeds in excess of 20Mbs by 2013 to all customers.
-----Service Area:  ND_Nelson

Submitter:  North Dakota Telephone

Comment:  North Dakota Telephone Company (NDTC) service territory overlaps approximately 45% of the Satellite Broadband Application LLC Nelson County proposed funded service area (PFSA). Satellite Broadband Application LLC Nelson designates this area as unserved and underserved. In the overlapping area, NDTC service advertises 30 meg service.

-----Service Area:  WA_Cowlitz

Submitter:  Scatter Creek InfoNet

Comment:  Scatter Creek InfoNet, Inc., for and on behalf of itself and its affiliate, Kalama Telephone Company, (the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Cowlitz County, Washington (“Cowlitz County”). The Company’s broadband service area includes a portion of Cowlitz County. The portion of Cowlitz County that is encompassed by the Company’s broadband service area is neither “unserved” nor “underserved.” The Application depicts as “underserved” a portion of the proposed funded service area that is proposed by the Application and that overlaps the Company’s broadband service area. To the extent of that overlap, the characterization of the proposed funded service area as “underserved” is inaccurate. Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Cowlitz County.

-----Service Area:  SD_CharlesMix

Submitter:  Midstate Communications, Inc.
Comment: We serve this area and offer 3 mg broadband service

Submitter: HANSON COMMUNICATIONS

Comment: Ft. Randall Telephone Company (“Company”), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the communities of Wagner and Lake Andes, SD which covers a portion of the proposed funded service area (“Area”) since 1996 after acquiring them from Qwest. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion the area is either unserved or underserved. At no time did the Applicant contact us to determine areas that presently have broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 98% of our end users in this area and of those 91% all are above the NOFA defined broadband speeds for unserved areas.

-----Service Area: MO_Worth

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM’s territory is neither unserved nor underserved.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency
officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: WY_Johnson

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.
Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: RT Communications

Comment: RT Communications, Inc (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Johnson County and the town of Kaycee. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout our serving territory. 80% of RT customers in this service area including subscriber households and business locations are capable of receiving DSL speeds in excess of 768k downstream and 200k upstream. Approximately 42% of residential households subscribe to the DSL service that is in excess of 768k downstream and 200k upstream. This service area is neither unserved or underserved as shown in the applicant's proposal.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) serving 2235 access lines in rural Northeastern Wyoming. Range service area includes Johnson, Crook, Weston, Campbell and Sheridan Counties. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 47% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.
The applicant’s proposed funded service area that overlaps Range’s service area in Wyoming is not unserved or underserved as represented in the applicant’s proposal.

With respect to Satellite Broadband ARRA Application LLC’s application for broadband funds support in Johnson County Wyoming, their comments that the areas are unserved or underserved are not true. The areas Range serves that were applied for in their application in Johnson County are capable of 1.5 mb or higher broadband service capable to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Johnson County Wyoming. Range has 4 employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area:  CO_Otero

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.
CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

**Submitter:** Stelera Wireless, LLC

**Comment:** The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The towns of La Junta and Rocky Ford are served by Stelera Broadband, a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

**Service Area:** MT_Ravalli

**Submitter:** DigitalBridge Communications Corp.

**Comment:** DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Bresnan) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 45% overlap of its coverage with the PFSA based on households served.
Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area

-----Service Area: WY_Campbell
Submitter: Range Telephone Cooperative

Comment:

Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) serving 2235 access lines in rural Northeastern Wyoming. Range service area includes Johnson, Crook, Weston, Campbell and Sheridan Counties. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 63% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Wyoming is not unserved or underserved as represented in the applicant’s proposal.

With respect to Satellite Broadband ARRA Application LLC’s application for broadband funds support in Campbell County Wyoming, their comments that the areas are unserved or underserved are not true. The areas Range serves that were applied for in their application in Campbell County are capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA Application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Campbell County Wyoming. Range has 2 employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.
-----Service Area:  MT_Wibaux

Submitter:  Mid-Rivers Communications

Comment:  As indicated on our response map, the majority of Wibaux County is NOT UNDERSERVED as the Applicant has stated. Mid-Rivers Communications currently provides and advertises broadband of up to 5 Mbps Downstream / 1 Mbps Upstream in Wibaux, and provides broadband meeting or exceeding the NOFA definition in other rural areas indicated on the map. Mid-Rivers is the Incumbent Local Exchange Provider in the Carlyle area of southern Wibaux County, and was recently approved for a Rural Utilities Service (RUS) loan to build Fiber to the Premise (FTTP) services to this area in the future.

-----Service Area:  OK_Carter

Submitter:  Cable One, Inc.

Comment:  Satellite Broadband ARRA Application LLC  Carter County, Ardmore, Oklahoma and surrounding areas.

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: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency
officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second ("mbps") downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Chickasaw Telephone Company

Comment: Chickasaw Telephone Company has been offering broadband speed data service to subscribers through its subsidiary Bright Net Oklahoma for 11 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary, is served with high speed internet broadband service.

-----Service Area: NE_Antelope
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: Plainview Telephone Company

Comment: Plainview Telephone Company (PTC) offers FTTP broadband internet service with up to 6 Mbps download speed and up to 2 Mbps upload speed. PTC is capable of delivering FTTP broadband service to all households in its service territory.

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is greater than 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.
-----Service Area: NM_Hidalgo

Submitter: Western New Mexico Telephone Company, Inc.

Comment: Respondent identifies locations within the Applicant’s service area that are not un-served or underserved.

-----Service Area: OK_Rogers

Submitter: Totah Communications, Inc.

Comment: Totah Communications, Inc.

OMB Control Number: 0660-0031

OMB Control Number: 0572-0142

Satellite Broadband (Sat) a satellite broadband provider, which is a non-terrestrial based service provider, in their Satellite Broadband ARRA Application, LLC – Rogers filing has incorrectly filed for ARRA funding for an area that includes a portion of Totah Communications, Inc.’s (Totah) rural exchange area in Oklahoma. The area Sat proposes to serve that covers Totah territory in Oklahoma is Talala. Sat has incorrectly identified the entire area of Talala as underserved. Sat is wrong in their assertion. Talala is already being served with broadband by Totah (Incumbent ILEC) in some of its area with speeds equal to or in excess of 768 bps. In addition, the area is also currently being served by at least one wireless provider. In the limited Talala areas in which 768 bps are not currently provided, Totah is still providing internet access. Additionally, Totah has requested ARRA funds in order to upgrade those limited areas with speeds equal to or in excess of 3 Mbps.

We oppose Sat’s filing and their request for funds covering Talala in Oklahoma on the basis that they have incorrectly identified the entire Talala area as underserved which is an incorrect assertion. We recommend that the Sat application be rejected.
If you have any questions, or need additional information please do not hesitate to contact us.

Sincerely,

Keith E. Watson

Totah Communications, Inc.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: OK_Muskogee

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where
funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter:  Cross Telephone Company LLC

Comment:  Cross Telephone Company LLC through its subsidiary, Cross Cable Television, Inc., has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cross Cable Television, Inc. also offers IPTV service to its subscribers within the exchanges Cross serves.

Submitter:  Cross Wireless L.L.C.

Comment:  Cross Wireless, LLC, has been offering broadband speed data service to its subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the wireless service area is served with high speed internet broadband service.

Submitter:  Windstream

Comment:  Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.
The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: OK_Cleveland

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 least ten years. Cox provides its customers in Oklahoma 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: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.
Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area:  TX_Ector

Submitter:  NTS Communications, Inc.

Comment:  NTS Communications, Inc. is currently providing Broadband Services greater than 3 mbps in the community of Odessa, TX.

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.
-----Service Area:  AZ_Graham

Submitter:  Cable One, Inc.

Comment:  AZ Graham - Safford System - 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.

-----Service Area:  NV_Chrurchill

Submitter: Charter Communication

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: 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: CC Communications

Comment: The applicant has erroneously classified the service area, Churchill County, as underserved. In addition to CC Communications offering service with download speeds of at least 3mbps, the local cable franchisee advertises speeds of at least 3mbps. Moreover, there are two more service providers advertising wireless and DSL broadband in much of the subject service area. This response will provide a recent add from CC Communications, facts about its coverage area and market share, as well as reference to the three other broadband competitors in the market without the benefit of tax dollars.
-----Service Area: OK_Pawnee

Submitter: Cimarron Telephone Co.

Comment: Cimarron Telephone Company through its subsidiary Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Cimarron Telephone Company serves.

-----Service Area: MT_Roosevelt

Submitter: Nemont Telephone Cooperative, Inc.

Comment: The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is not aware of broadband services provided by others in the area. This funded service area has been defined as 'unserved' when Nemont can demonstrate that, not only is the designation of "unserved" not applicable, this area does not qualify as 'underserved'. The services that Nemont offers and provides in this proposed funded service area far exceed the thresholds set of more than 10% of households having access to broadband service (as defined in the NOFA).

-----Service Area: TX_Martin

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Stanton is served by Stelera Broadband, a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.
-----Service Area: NE_Hayes

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA. One hundred percent of the customers to which Consolidated provides landline telephone service within the PFSA are broadband capable. Broadband stimulus funds can be used more effectively elsewhere.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

Submitter: BWTelcom

Comment: Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, current provide service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least 768/200 Kbps. The current residential take rate of Broadband at a speed of 768/200 Kbps or higher is 41% of households. BWTelcom offers a 5 Mbps service.
-----Service Area: MT_Madison

Submitter: 3 Rivers Telephone Cooperative, Inc.

Comment: This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----Service Area: UT_BoxElder

Submitter: Wirelessbeehive.com LLC

Comment: We currently provide broadband to the communities and surrounding area of Park Valley, Grouse Creek and Lucin, in Box Elder County.

Submitter: Citizens Telecommunications Company of Utah

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

-----Service Area: MO_Grundy

Submitter: GVNW Consulting, Inc
Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: TX_Roberts

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: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Miami, Texas for which funds are being requested in this application, we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

-----Service Area: WY_Albany

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area: NV_Elko
Submitter: Wirelessbeehive.com LLC

Comment: Wirelessbeehive.com currently serves the Elko county area with broadband service.

Submitter: Citizens Telecommunications Company of Nevada

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

Service Area: ID_Lincoln

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:

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

Discounted bundles and promotional pricing are also available.

Submitter: Safelink Internet

Comment: Lincoln County is already served by 5 last mile providers.

-------Service Area: KS_Sherman

Submitter: S&T Telephone Cooperative Assciation

Comment: S&T Communications LLC., a wholly owned non-regulated subsidiary of S&T Telephone Cooperative Assn., currently provides Broadband service in the cities of Goodland, Colby and Oakley, KS. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 49% of households. S&T Communications LLC offers a 3 Mbps service. S&T Communications LLC Goodland CLEC meets all ARRA NOFA requirements to be classified as a "Served" area.
**Submitter:** S&T Telephone Cooperative Association

**Comment:** S&T Telephone Cooperative Assn. currently provides Broadband service in its certificated exchange areas. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 30% of households. S&T Telephone Cooperative Assn. offers a 3 Mbps service. Therefore, S&T Telephone Cooperative Assn. service areas do not meet the ARRA NOFA classification of “Unserved”

-----Service Area: NM_Guadalupe

**Submitter:** ENMR Telephone Cooperative, Inc.

**Comment:** ENMR currently serves most of Guadalupe County with DSL as part of its telephone service area.

-----Service Area: OK_Okfuskee

**Submitter:** Allegiance Communications, LLC

**Comment:** Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.
Submitter: Central Oklahoma Telephone Co.

Comment: Central Oklahoma Telephone Company has been offering broadband speed data service to subscribers for 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an unserved area. Windstream offers facilities-based, terrestrial broadband service at advertised speeds of greater than 768 kbps downstream and 200 kbps upstream to some of the households within the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as unserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “unserved area” as follows: “Unserved area means a proposed funded service area, composed of one or more contiguous census blocks, where at least 90 percent of households in the proposed funded service area lack access to facilities-based, terrestrial broadband service, either fixed or mobile, at the minimum broadband transmission speed (set forth in the definition of broadband above). A household has access to broadband service if the household can readily subscribe to that service upon request.”

-----Service Area: IA_Shelby

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: 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).

-----Service Area: TX_Potter

Submitter: NTS Communications, Inc.

Comment: NTS Communications, Inc. currently provides Broadband Services greater than 3 mbps in the community of Amarillo, TX.

-----Service Area: OR_HoodRiver

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.
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.

-----Service Area: NE_Hall

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 80 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.
Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Hall 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

Submitter: Hamilton.net, Inc.

Comment: DSL continues to be offered in the southeast section of our response area. With DSL our standard packages offer speeds from 768k down/256k up to 6Mb down/512Mb up. In addition to DSL, in the majority of this area we offer unmetered broadband services using 3G 1XEVDO/Rev A. Our brand name for this service is "GMAX" and has a maximum download speed of 3.1Mb. This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service. We also offer unlicensed wireless services in portions of this area as well with 768k down/768 up speeds.

-----Service Area: NE_Gage

Submitter: Diller Telephone Company

Comment: Diller Telephone Company (DTC) provides broadband internet service at download speeds up to 1.5 Mbps. 100% of the households in the DTC service area are capable of receiving broadband internet service of at least 768kbps/200kbps. The subscriber rate is greater than 40% for the DTC service area.

-----Service Area: UT_Beaver

Submitter: South Central Utah Telephone Association

Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service
in portions of Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant's characterization of Beaver county, Utah as being underserved is entirely without merit. In 2007, we engaged an independent market research firm to determine, among other things, broadband adoption rates in the St. George, Utah BTA, which includes all of Beaver, Garfield, Iron, Kane and Washington counties. It was determined with a 95% Confidence Level and a Confidence Interval of +/- 5% that Broadband adoption in the St. George BTA was 56%. Clearly the area is not underserved.

-----Service Area:  SD_Kingsbury

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Broadband Satlite Kingsbury East for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  KS_Franklin

Submitter:  Allegiance Communications, LLC

Comment:  Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.
Submitter: Mercury Wireless, LLC

Comment: Mercury Wireless currently provides up to 3 mbps wireless Internet access to sections of the applicant's proposed service area.

-----Service Area: NM_Colfax

Submitter: ENMR Telephone Cooperative, Inc.

Comment: ENMR currently serves a portion of Colfax County with DSL as part of its telephone service area.

Submitter: Baca Valley Telephone Company, Inc.

Comment: Baca Valley Telephone Company, Inc. provides the city of Maxwell, New Mexico with 1 Mb downstream, 384 Kbps upstream DSL service. Based on the NOFA definition of “unserved”, where at least 90 percent of households lack access to facilities-based, terrestrial broadband service at the minimum broadband transmission speed of 768 kbps downstream and 200 kbps upstream, the city of Maxwell NOT “unserved”, as Satellite Broadband ARRA Application LLC as indicated.

-----Service Area: TX_Runnels

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own
facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Taylor Telephone Cooperative, Inc.

Comment: The proposed funded services area of Satellite Broadband located in Runnels County, TX, does not meet the criteria for underserved because Taylor Telephone Cooperative provides up to 6 Meg service to 90% of the PFSA. Although Taylor does not cover the entire PFSA the 96 premises covered disqualifies the entire area.

-----Service Area: KS_Ottawa

Submitter: Cunningham Communications

Comment: Cunningham Telephone Company, with its affiliate Cunningham Communications has been providing high-quality communications services to the residents of the rural communities of northwestern Kansas for more than 65 years. It was one of the first providers in this remote area to offer broadband services eleven years ago. Currently, almost 100% of Cunningham’s service areas have broadband capability reaching speeds up to 10 Mbps.

In keeping with its long tradition of providing cutting-edge technologies, Cunningham has begun a Fiber To The Home (FTTH) project. Through this FTTH project, estimated to be completed in 2012, every customer in a majority of Cunningham’s service areas, even in the most remote rural areas, will have a direct fiber feed from their home and business to the world.

Cunningham is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Cunningham provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because Cunningham’s owners and employees have a personal stake in the communities where they work and live.
Submitter: RC Technologies

Comment: As illustrated on the map below, the proposed funded service area of the applicant, Satellite Broadband ARRA Application LLC, proposes to serve an area (Richland, ND) currently served by RC Technologies (RCT). Within the 13 square mile area of overlap, RCT provides DSL service with speeds of up to 1.5 Mbps down and 768 Kbps up to 100% of households and businesses.

Submitter: Red River Rural Telephone

Comment: Red River Rural Telephone demonstrates that it provides broadband service throughout Richland County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, over 50% of households in Red River’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 Red River; over 50% of the households in Red River’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; Red River 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 37 percent of households.

Submitter: Mid-Rivers Communications
Comment: As shown on our response map, a large portion of this area is NEITHER UNSERVED OR UNDERSERVED as the Applicant has indicated. Mid-Rivers Communications currently provides and advertises broadband services up to 10 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in and around the community of Glendive, Montana, in competition with at least one other broadband provider. Mid-Rivers also provides broadband up to 12 Mbps / 2 Mbps upon request in the Glendive area, in addition to Business Internet and Ethernet services scalable up to symmetrical speeds of 100 Mbps. We advertise and offer broadband up to 3 Mbps Downstream in the West Glendive area; up to 1.5 Mbps Downstream in and around Bloomfield, Lindsay, Richey; and up to 768 Kbps Downstream in other rural areas indicated on the response map. Mid-Rivers also currently has in place a Gigabit Ethernet fiber route going West out of Glendive along Interstate 94.

-----Service Area: WY_Goshen

Submitter: James Cable LLC

Comment: James Cable LLC provides 8Mb broadband service to the communities of Goshen, Lingle and Torrington, Wyoming.

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area: KS_Clark

Submitter: FairPoint Broadband d/b/a FairPoint Communications

Comment: FairPoint Broadband d/b/a FairPoint Communications (“FairPoint”) is responding to this Public Notice Filing regarding Satellite Broadband ARRA Application LLC’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is all of Clark County, Kansas. FairPoint is an incumbent broadband provider that currently offers broadband service (as defined in the
NOFA) to 100% of its service area as outlined in the response area map in Clark County, Kansas. For the proposed funded service area which overlaps with FairPoint’s incumbent service area, the applicant claims that it is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “underserved” is not true for two of the three criteria in the NOFA.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices,
wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.

-----Service Area:  TX_Andrews

Submitter:  Stelera Wireless, LLC

Comment:  The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Andrews is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area:  OK_Comanche

Submitter:  Pioneer Telephone Cooperative

Comment:  Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter:  Wichita Online Inc.

Comment:  Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural
economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed
funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.

Submitter: Medicine Park Telephone Company

Comment: Medicine Park Telephone Company (MPTC) currently provides a wide array of broadband offerings within the proposed funded service area. MPTC has been offering broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. MPTC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Competitive Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through MPTC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. MPTC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----Service Area: MO_Clinton

Submitter: Grand River Mutual Tel. / Lathrop Tel.

Comment: Satellite Broadband ARRA’s application covers part of Grand River Mutual Telephone Company / Lathrop 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: NPG Cable, Inc.
Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: NPG CABLE INC.,

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

-----Service Area: MN_Pope

Submitter: Runestone Telephone Association

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Cyrus exchange in Pope County that is currently served by Runestone Telephone Association. We currently serve the exchange by a fiber-to-the-home network. In the public notice response Runestone Telephone Association is providing; 1) a map of the overlapping area Runestone provides broadband services, 2) Runestone'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: diversiCOM-Wisper Wireless Solutions, LLC

Comment: In mid 2005 we created a company, Wisper Wireless to invest in rural areas using wireless technologies where little or no broadband service was available. Today we are using wireless cutting edge (WiMAX) technology to deliver these services. Initial and ongoing investment dollars are
significant. Further, there is a limited amount of households in these markets to support this effort or that are requesting service. As part of this effort we also provide internet classes to our customers to educate them on the basic of internet, web browsing and email. Due to the low population densities we believe sustainable adoption is a more vital tool then putting more providers to cover the same area.

Submitter: Federated Telephone Cooperative

Comment: i. Federated Telephone Cooperative service territory overlaps approximately 2% (based upon households passed) of the Satellite Broadband ARRA Application LLC – MN_Pope proposed funded service area (PFSA). FTC provides service to approximately 10% (9.66% not including businesses) of the area marked as unserved by the application thus disqualifying it as unserved. When combined with other competitors in the PFSA, it is anticipated that over 10% of the unserved area will be served. In addition, FTC provides service to the entire overlap area with service that is advertized at 3 Mbps or above. Federated has built a fiber to the premise network covering all of its exchanges.

Submitter: Lowry Telephone Company LLC

Comment: Satellite Broadband ARRA Application LLC’s proposed project covers the exchange area served by Lowry Telephone Company LLC. We currently serve the exchange by an existing fiber / copper network. In the public notice response Lowry Telephone is providing; 1) a map of the overlapping area Lowry provides broadband services, 2) Lowry’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: Starbuck Telephone Company

Comment: Starbuck Telephone Company has been providing telecommunications service to the community of Starbuck since 1902. Since 1996, the Company began providing broadband service to the community and the surrounding area.

We disagree with the Applicant’s assertion the area is either unserved or underserved. At no time did the Applicant contact us to determine areas that presently have broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company provides
broadband service to 100% of our end users and of those 100% are above download speeds greater than 768 kbps.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: IA_Lucas

Submitter: Mediacom Communications Corporation

Comment: A large number of households in applicant's proposed service area are currently served by Mediacom. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant's proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up 20 Mbps.

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: TX_TomGreen
Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in Tom Green County, TX, an area covered by Satellite Broadband’s Tom Green County broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 15% of its potential subscribers. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. Central Texas’ provision and advertising of broadband service, coupled with the combined penetration rate of all broadband providers, should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

------Service Area: OK_Bryan

Submitter: James Cable LLC

Comment: James Cable LLC provides 8Mb broadband service to the communities of Durant, Armstrong, Caddo, Calera, Colbert, and Bryan County, Oklahoma. We provide 3Mb service to the communities of Achille and Bokchito, Oklahoma.

Submitter: TV Cable of Grayson County

Comment: Grayson County Cable (GCC) currently provides a wide array of broadband offerings within the proposed funded service area. GCC has been offering broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. GCC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through GCC, but several ILEC’s, Wireless companies, and numerous mobile broadband service providers offer several choices to the subscriber. GCC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.
Submitter: Cherokee Telephone Company

Comment: Cherokee Telephone Company (CTC) currently provides a wide array of broadband offerings within the proposed funded service area. CTC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. CTC's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Competitive Local Exchange Carriers, and CTC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through CTC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. CTC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----Service Area: TX_Hudspeth

Submitter: Dell Telephone Cooperative, Inc.

Comment: Dell Telephone Cooperative Inc. provides areas of rural Hudspeth County, Texas with DSL service including the community of Dell City, TX. Currently we offer three DSL plans, two of which exceed minimum broadband transmissions speed of 768 kbps downstream and 200 kbps upstream. Based on the Census information, in this area, Dell Telephone provides broadband service to 40% of households and 33% of businesses. Based on the NOFA definition of “unserved”, where at least 90 percent of households lack access to facilities-based, terrestrial broadband service at the minimum broadband transmission speed of 768 kbps downstream and 200 kbps upstream, the area of Hudspeth County where we serve is NOT “unserved”, as Satellite Broadband ARRA Application LLC has indicated.

-----Service Area: IA_Cherokee
Submitter: Mediacom Communications Corporation

Comment: A large number of households in applicant's proposed service area are currently served by existing broadband providers such as Mediacom and Northwest Telephone Co-Op. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant's proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up 20 Mbps.

Submitter: Evertek, Inc

Comment: Evertek 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: C-M-L Telephone

Comment: Broadband stimulus funding for the Iowa exchange of Meriden should be funded through the C-M-L Telephone Cooperative application rather than the Satellite Broadband ARRA Application, LLC's application. Data to further substantiate this response can be found in the comments section below.

Submitter: WesTel Systems

Comment: WesTel Systems demonstrates that it provides broadband service throughout the Marcus and Quimby areas which are encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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.
----Service Area: TX_Terry

Submitter: Poka Lambro Telephone Cooperative, Inc.

Comment: Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Brownfield is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

----Service Area: KS_Hamilton

Submitter: Pioneer Communications, Inc.

Comment: Pioneer Communications, a wireline telecommunications provider serving 10 counties in western Kansas, has connected rural communities for more than five decades, and today delivers telephone, cable television and high-speed Internet service. Pioneer first became an Internet Service Provider (ISP) in 1995 by introducing educational Internet networking services for the schools located in
its service area, and soon thereafter, made Internet access available commercially to Pioneer’s telephone customers. Currently, Pioneer provides broadband internet access to 100% of its wireline service area using both Digital Subscriber Line (DSL) over its telephony infrastructure, and data over cable modems via its cable television system.

The applicant’s Proposed Service Area Hamilton County, all of which falls within Pioneer Communications’ service area. The Proposed Service Area incorrectly classifies the western portion of Hamilton County as unserved. Pioneer offers broadband internet access to every household in Hamilton County. Pioneer’s rate of broadband subscribership for the proposed service area is roughly 40 percent of households.

Pioneer consistently and effectively advertises the availability of its broadband internet access throughout the Hamilton County area. Advertisements for Pioneer’s broadband internet access service can be found in the local newspaper, on television, on billing inserts and on the radio. Pioneer also frequently advertises by providing sponsorship to area high school events and other community activities. The attached document is an example of ads that were distributed in Hamilton County.

In conclusion, Pioneer emphasizes that it offers broadband not only to those customers living within towns, but also to those residing far from city limits, places such as western Hamilton County. The above referenced application wrongly classifies the entire western half of Hamilton County as unserved. Pioneer asserts that Hamilton County is well-served by broadband internet access and that the above referenced application does not meet the conditions of “unserved” as set forth in the NOFA.

Submitter: United Telephone Assn.

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s wireless EVDO RevA network supports wireless broadband at speeds up to 3.1 Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.
United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy.

-----Service Area:  KS_Logan

Submitter:  S&T Telephone Cooperative Association

Comment:  S&T Telephone Cooperative Assn. currently provides Broadband service in its certificated exchange areas. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 30% of households. S&T Telephone Cooperative Assn. offers a 3 Mbps service. Therefore, S&T Telephone Cooperative Assn. service areas do not meet the ARRA NOFA classification of “Unserved”

Submitter:  S&T Telephone Cooperative Associatin

Comment:  S&T Communications LLC., a wholly owned non-regulated subsidiary of S&T Telephone Cooperative Assn., currently provides Broadband service in the cities of Goodland, Colby and Oakley, KS. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 40% of households. S&T Communications LLC offers a 3 Mbps service. S&T Communications LLC meets all requirements in the Oakley CLEC area to be classified as a "Served" area.
-----Service Area:  TX_Parmer

Submitter:  ENMR Telephone Cooperative, Inc.

Comment:  ENMR currently serves western Parmer County with DSL as part of its telephone service area.

-----Service Area:  SD_Clay

Submitter:  Knology, Inc.

Comment:  Knology is making broadband service available to approximately 41% of areas designated as "Underserved" in the Satellite Broadband proposed funded service area (PFSA) in Clay County, South Dakota. Satellite Broadband may not be meeting the definition of “Underserved” because Knology, is providing service to more than 40% of the households in the PFSA. Knology, along with other service providers in the area, may also be making broadband service available to more than 50% of the PFSA. Furthermore, Knology is advertising broadband service exceeding 3 mbps in underserved areas of the Satellite Broadband proposed funded service area. Information regarding Knology’s subscriber penetration and plans for upgrade are provided in the comments section.

Submitter:  HANSON COMMUNICATIONS

Comment:  Ft. Randall Telephone Company (“Company”), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the areas South of the community of Centerville, SD which covers a portion of the proposed funded service area (“Area”) since 1997 after purchasing it from Qwest Communications. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion that the area is either unserved or underserved. At no time did the Applicant contact us to determine the status of the area regarding broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 79% of our end users in this area and of those 100% all are above the NOFA defined broadband speeds for unserved areas.
-----Service Area:  WA_Whatcom

Submitter:  Whidbey Telephone Company

Comment:  Whidbey Telephone Company dba Whidbey Telecom (the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Whatcom County, Washington (“Whatcom County”). The Company’s broadband service area includes a portion of Whatcom County. The portion of Whatcom County that is encompassed by the Company’s broadband service area is neither “unserved” nor “underserved,” and the Application does not depict or describe it as either “unserved” or “underserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Whatcom County.

Submitter:  WaveDivision Holdings, LLC

Comment:  WaveDivision Holdings, LLC (“Wave”) is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC (“Applicant”) for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.

-----Service Area:  NM_Harding

Submitter:  ENMR Telephone Cooperative, Inc.

Comment:  ENMR currently serves all of Harding County with DSL as part of its telephone service area.
-----Service Area: NM_Quary

Submitter: ENMR Telephone Cooperative, Inc.

Comment: ENMR currently serves much of Quay County with DSL as part of its telephone service area.

Submitter: Plateau

Comment: Plateau currently serves Tucumcari with a licensed fixed wireless service.

-----Service Area: TX_Jones

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: UT_Sanpete

Submitter: Gunnison Telephone Company

Comment: Gunnison Telephone Company (GTELCO) is capable of providing broadband at speeds up to 5mbps download and 1024kbps upload to 100% of its customers in its Gunnison local exchange area. It appears that Satellite Broadband AARA application overlaps GTELCO's local service territory that
includes the communities of Gunnison, Centerfield, Mayfield, Fayette, and Axtell and the company believes that its local service territory is neither unserved nor underserved for broadband services.

**Submitter:** Central Telcom Services, LLC

**Comment:** Central Telcom Services, LLC dba CentraCom Interactive provides 5 mg high speed internet service, as well as video and voice services to communities throughout Sanpete County, Utah.

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**Service Area:** KS_Stafford

**Submitter:** South Central Telephone Association, SCTelcom

**Comment:** SCTA, established in 1953, is submitting a response to dispute service availability for a portion of the applicant’s area. We would like to establish the fact that we are providing broadband access exceeding the 768 Kbps minimum as defined by the NOFA. We have been advertising High speed Broadband service of 1.5, 3, and 6Mbps in our response area.

**Submitter:** GBT Communications

**Comment:** Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it
serves coupled with its half-century of experience providing advanced communication services in
difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7
customer service and local offices. GBT provides necessary broadband services to community anchor
institutions including schools, libraries, local government offices and public safety agencies. It serves
from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the
communities where they work and live.

-----Service Area:  NE_Stanton

**Submitter:**  Stanton Telecom, Inc.

**Comment:**  For the portion of this application that overlaps the Stanton Telecom, Inc. serving area,
broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households
and 100% of businesses. Additionally, Stanton Telecom, Inc. offers a 3Mbps downstream and 6Mbps
downstream service in this area. Lastly, Stanton Telecom, Inc. supplies broadband service to over 40%
of the households in this area. Per the criteria defined for the stimulus program, this area is classified as
served.

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

**Comment:**  For the portion of this application that overlaps the Pierce Telephone Company, Inc. serving
area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households
and 100% of businesses. Additionally, Pierce Telephone Company, Inc. offers 3Mbps, 8Mbps, 10Mbps, and 12Mbps service in this area. Lastly, Pierce Telephone Company, Inc. supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

**Submitter:**  Cable One, Inc.

**Comment:**  NE_Stanton - Norfolk -
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.
-----Service Area:  OR_Deschutes

Submitter:  Community Broadband

Comment:  Cover parts of Deschutes county. Three other wireless providers cover this area as well. WEb4mix, Yellow Knife and PrineTime

Submitter:  Yellowknife Wireless Company, LLC

Comment:  Yellowknife Wireless Company provides Internet service from 3 Mbps to 10 Mbps to 90% of the populated areas of Deschutes County.

-----Service Area:  MO_Mercer

Submitter:  GVNW Consulting, Inc

Comment:  Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area:  SD_Hutchinson

Submitter:  Midstate Communications, Inc.
**Comment:** We serve this area and offer 3 mg broadband service.

**Submitter:** Santel Communications

**Comment:** Santel Communications demonstrates that it provides broadband service throughout Hutchinson County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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.

-----Service Area: CO_Summit

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Summit for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ND_Pierce
Submitter: North Dakota Telephone

Comment: North Dakota Telephone Company (NDTC) service territory overlaps 100% of the Satellite Broadband Application LLC Pierce County proposed funded service area (PFSA). Satellite Broadband Application LLC Pierce County designates this area as underserved. In the overlapping area, NDTC service advertises 30 meg service. The penetration for NDTC alone is close to 40% in the area so when combined with other providers the total penetration maybe over 40%.

-----Service Area: KS_Graham

Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, offers broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

-----Service Area: OR_Sherman

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.
This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  KS_Decatur
Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, offers broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are served as defined in the NOFA.

Submitter: BWTelcom

Comment: Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service at a rate of at least 768/200 Kbps. The current residential take rate of Broadband services at a speed of 768/200 Kbps or higher is 40% of households. BWTelcom offers a 5 Mbps service.

-----Service Area: KS_Scott

Submitter: S&T Telephone Cooperative Association

Comment: S&T Telephone Cooperative Assn. currently provides Broadband service in its certificated exchange areas. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 30% of households. S&T Telephone Cooperative Assn. offers a 3 Mbps service. Therefore, S&T Telephone Cooperative Assn. service areas do not meet the ARRA NOFA classification of “Unserved”

-----Service Area: SD_Hand

Submitter: Venture Communications Cooperative

Comment: Venture Communications Cooperative demonstrates that it provides broadband service throughout Hand County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.
As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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.

-----Service Area:  KS_Lane

Submitter:  S&T Telephone Cooperative Association

Comment:  S&T Telephone Cooperative Assn. currently provides Broadband service in its certificated exchange areas.  100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher.  The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 30% of households.  S&T Telephone Cooperative Assn. offers a 3 Mbps service.  Therefore, S&T Telephone Cooperative Assn. service areas do not meet the ARRA NOFA classification of “Unserved”

Submitter:  GBT Communications

Comment:  Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years.  GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore.  As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps.  To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989.  Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas.  Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project.  Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.
Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

-----Service Area:  IA_Woodbury

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:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, IA Woodbury 3 for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.
Submitter: Craw-Kan Telephone Cooperative, Inc.

Comment: Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

Submitter: LaHarpe Telephone Co., Inc.

Comment: LaHarpe Telephone Company, Inc has expended more than $2,500,000 of a loan from USDA to construct a fiber to the premises in LaHarpe, KS and the surrounding rural area. The fiber to the premises build is complete and the citizens in the area have one of the most advanced systems in the nation with internet capability in the range of 100M/sec. Overbuilding with grant money could put repayment of our loan in jeopardy.

Submitter: North Texas Broadband

Comment: North Texas Broadband (NTBB) currently provides a wide array of broadband offerings within the proposed funded service area. NTBB has been offering broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. NTBB’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through NTBB, but several ILEC’s, Wireless companies, and numerous mobile broadband service providers offer several choices to the subscriber. NTBB’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map,
or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----Service Area:  CA_Mono

Submitter:  NPG Cable, Inc.

Comment:  NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

-----Service Area:  CO_Bent

Submitter:  CenturyLink

Comment:  CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Las Animas is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area: SD_Codington

Submitter: RC Technolgies

Comment: As illustrated on the map below, the proposed funded service area of the applicant, Satellite Broadband ARRA Application LLC, proposes to serve an area (Codington) currently served by RC Technologies (RCT). Within the 706 square mile area of overlap, RCT has the capability to provide broadband service with its 2.5Ghz BRS/EBS wireless service at speeds of up to 2 Mbps down and 1 Mbps up.

Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of rural Codington County which is encompassed in the proposed
funded Service Area in the Satellite Broadband ARRA Application and that the proposed funded Service Area is not unserved or underserved. As demonstrated, 92% of households in ITC’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 ITC; 92% of the households in ITC’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; ITC does not 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 2.4% of households. Monies are currently being expended to upgrade facilities to offer minimum 1.5Mbps and higher speeds to the entire service area.

-----Service Area: OK_Hughes

Submitter: Cherokee Telephone Company

Comment: Cherokee Telephone Company (CTC) currently provides a wide array of broadband offerings within the proposed funded service area. CTC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. CTC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Competitive Local Exchange Carriers, and CTC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through CTC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. CTC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service
(meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: WA_Thurston

Submitter: Yelm Telephone Company
Comment: Yelm Telephone Company ("Yelm") is responding to this Public Notice Filing regarding Satellite Broadband ARRA Application LLC’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is located in Thurston County, Washington. Yelm is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 100% of its service area as outlined in response area map in Thurston County, Washington. For the proposed funded service area which overlaps with Yelm’s incumbent service area, the applicant claims that it is “unserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “unserved” is not true. Further, the applicant did not designate at least 75% of the proposed funded service area as “unserved” or “underserved.

Submitter: Scatter Creek InfoNet

Comment: Scatter Creek InfoNet, Inc., for and on behalf of itself and its affiliate, Tenino Telephone Company, (the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Thurston County, Washington (“Thurston County”). The Company’s broadband service area includes a portion of Thurston County. The portion of Thurston County that is encompassed by the Company’s broadband service area is neither “unserved” nor “underserved,” and the Application does not depict or describe it as either “unserved” or “underserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Thurston County.

-----Service Area: MO_Aitchison

Submitter: Rock Port Telephone Company and Affiliates

Comment: Executive Summary: Rock Port Telephone Company and its affiliates advertise and are capable of providing broadband service at download rates of 1, 3 and 5 mbps to 99% of the households in their exchange territory. Within that ILEC service area 46% of households have subscribed to the broadband product. Countywide, we provide broadband service with speeds greater than 3mbps to 32% of the households. In that area, two other companies also offer broadband. The three companies’ combined customer count is greater than 40%. Atchison County does not qualify as an unserved or underserved area.
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: 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: WesTel Systems

Comment: WesTel Systems demonstrates that it provides broadband service throughout the Alton area which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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: 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).

-----Service Area: OK_KingFisher

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area: CA_Amador

Submitter: Volcano Communications Group

Comment: Based on the definition of unserved and underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the California communities of Volcano, Pine Grove, Pioneer, Ione, Camanche and Pine Acres are neither unserved nor underserved and do not qualify for Broadband Stimulus funds. Volcano Communications Group (Volcano) provides broadband to 95% of the residences and businesses in the California communities listed above. Data to further substantiate this response can be found in the comments section below.

-----Service Area: TX_Briscoe
Submitter: Cap Rock Telephone Cooperative

Comment: Briscoe County Texas is being labeled as an Underserved rural area. We challenge the position regarding the Briscoe County Texas rural population as an underserved location.

Cap Rock Telephone Cooperative, Inc. is the Incumbent Local Exchange Carrier in the Southeastern rural area of Briscoe county including the community of Quitaque, Texas (see map). We provide landline and broadband service offerings. It should be noted the rural areas are sparsely populated and providing these services is challenging. Broadband is available from satellite service providers in these rural areas as well as the cable service providers within the community of Quitaque, Texas. Cap Rock Telephone Cooperative, Inc. has and will continue to invest in providing services to customers in rural Texas including Briscoe County Texas. Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Briscoe county Texas rural area. Competition is healthy with the limited potential customers. Due to competition within our service area, it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: TX_Garza

Submitter: Poka Lambro Telephone Cooperative, Inc.

Comment: Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: Garza County Texas is being labeled as an Unserved rural area. We challenge the position regarding Garza County Texas considered an unserved location.

As the Incumbent Local Exchange Carrier in a portion of this rural area (see map) we provide landline and broadband service offerings in the eastern, northeastern, southern and southeastern locations of
Garza County Texas. Equally as important the rural areas are sparsely populated and provide a challenge in providing these services. Most populated rural areas within Garza County Texas have broadband services available. A majority of potential customers do not choose to receive the service today. Cap Rock Telephone Cooperative, Inc. has and will continue to invest in providing services to customers in rural Garza County Texas.

Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Garza county rural area. Competition exists with limited potential customers in this area. Satellite service providers and wireless broadband opportunities are available to these residents and businesses located in rural Garza County Texas. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: KS_Dickinson

Submitter: The Tri-County Telephone Association, Inc.

Comment: The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.
TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter: TC Wireless

Comment: TC Wireless, Inc, along with its parent company The Tri-County Telephone Association, Inc., has been providing communications services to rural Kansas for over 46 years. TC Wireless was formed in 2004 specifically to provide wireless broadband services to communities that larger companies ignored. TC Wireless is a pioneer in providing high-quality services over the 700 Mhz wireless spectrum. It acquired its licenses at auction in 2002, taking a chance on the unproven spectrum. It began providing services in this band as soon as equipment was available. To meet the specific needs of the communities it serves, TC Wireless has expanded its offerings to include the 900 MHz and 2.4 MHz bands.

By utilizing an array of licensed and unlicensed spectrum, TC Wireless achieved a task five years ago that some still say today is not possible – bringing high speed Internet access to rural and remote areas. It did this, at considerable cost, because, as a local company, TC Wireless’ owners, who are also its customers, have a personal stake in the communities where they work and live. As a result, TC Wireless is providing rural America with advanced, reliable communications service.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to
the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area:  ID_NezPerce

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.

-----Service Area: IA_Crawford

Submitter: Westside Independent Telephone Co Western Iowa Net

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Westside, IA exchange served by Westside Independent Telephone Company dba Western Iowa Networks. We currently serve the exchange 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. In the public notice response Westside Independent Telephone Company dba Western Iowa Networks (Westside) is providing; 1) a map of the overlapping area Westside provides broadband services, 2) Westside’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: 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. All of our customers with high speed internet in this proposed area currently use our 512 speed. With none using 1024, 1536 and 3072.

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

**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: TX_ElPaso

**Submitter:** Time Warner Cable Inc

**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.”

-----Service Area: NM_Eddy

**Submitter:** Penasco Valley Telephone Cooperative Inc.

**Comment:** Penasco Valley Telephone Cooperative Inc. is providing an upload document that shows our internet speeds along with pricing. By viewing the NM Eddy map you will notice that our ILEC area shaded in purple is the area that is served with high speed internet service. We can currently provide
ADSL2+ internet to over 90% of the households in this area. The majority of our facilities are provided with the help of RUS loans and would require additional and redundant spending to fund this project.

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Plateau

Comment: Plateau currently serves areas in Eddy County with a licensed fixed wireless service.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.
The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: PVT NetWorks, Inc.

Comment: PVT NetWorks, Inc. serves the majority of the Eddy county map that has been overlapped by Satellite Broadband ARRA Application LLC. We are currently offering high speed internet with 700 MHz service, FTTP and also with cable modem service. PVT NetWorks, Inc. is offering packages up to 3.0 MHz. PVT NetWorks, Inc. leases excess capacity from Peñasco Valley Telephone Cooperative Inc. facilities for backhaul and transport. These facilities were initially provided through RUS loans. The proposed project would require additional and redundant federal spending. Excess capacity may be leased from Peñasco Valley Telephone Cooperative Inc. as a much more financially prudent alternative to duplicate federal funding.

-----Service Area: TX_Gray

Submitter: NTS Communications, Inc.

Comment: NTS Communications, Inc. is currently providing Broadband Services at download speeds greater than 3 mbps to the community of Pampa, TX.
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.

-----Service Area: MT_Musselshell

Submitter: Mid-Rivers Communications

Comment: As indicated on our response map, the majority of the Applicant’s Proposed Funded Service Area is NOT UNDERSERVED as they have stated. Mid-Rivers Communications, the Incumbent Local Exchange provider throughout this area, currently provides and advertises broadband of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in the communities of Roundup, Musselshell, and Melstone, and broadband meeting the NOFA definition to other surrounding rural areas. We have also recently been approved for a Rural Utilities Service (RUS) loan for future construction of Fiber to the Premise (FTTP) services in these Exchanges.

-----Service Area: SD_Edmunds

Submitter: Venture Communications Cooperative

Comment: Venture Communications Cooperative demonstrates that it provides broadband service throughout the Bowdle and Roscoe areas in Edmunds County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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: Valley Telecommunications Coop

Comment: Valley Telecommunications Cooperative (Valley) 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. Valley is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. In the area of overlap, greater than 50% of households have access to facilities-based broadband service and the rate of broadband subscribership for residential households and business establishments exceeds 40%. Valley also advertises broadband transmission speeds of at least 3 Mbps downstream within the area of overlap.

-----Service Area: NE_Franklin

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

Submitter: Glenwood Telephone Membership Corporation

Comment: Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

-----Service Area: TX_Uvalde

Submitter: Time Warner Cable Inc
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.”

-----Service Area: KS_Jefferson

Submitter: Giant Communications LLC

Comment: We provide CATV and Cable Modem internet to the following communities in Jefferson County KS

Oskaloosa, KS
Mcclouth, KS
Nortonville, KS
Winchester, KS
Ozawkie, KS
Valley Falls, KS

Submitter: sci cable

Comment: Provides broadband service in service area with video, High Speed Data and VOIP/ launch date voip 12-1-09 construction is rural with 60% of construction last mile

Submitter: Mercury Wireless, LLC

Comment: Mercury Wireless currently provides up to 3 mbps wireless Internet access to sections of the applicant’s proposed service area.
Comment: Pioneer Communications, a wireline telecommunications provider serving ten counties in western Kansas, has connected rural communities for more than five decades, and today delivers telephone, cable television and high-speed Internet service. Pioneer first became an Internet Service Provider (ISP) in 1995 by introducing educational Internet networking services for the schools located in its service area, and soon thereafter, made Internet access available commercially to Pioneer’s telephone customers. Currently, Pioneer provides broadband internet access to 100% of its wireline service area using Digital Subscriber Line (DSL) over its telephony infrastructure, and data over cable modems via its cable television system.

The Proposed Service Area for the referenced application covers all of Kearny County, except for an area near the town of Lakin, nearly all of which is falls within Pioneer Communications’ wireline service area. Pioneer offers broadband not only to those customers living within city limits, but also to households and businesses located in the far reaches of its territory in Kearny County. Pioneer’s rate of broadband subscribership for the proposed service area is greater than 40 percent of households.

Pioneer consistently and effectively advertises the availability of its broadband internet access throughout the Kearny County area. For example, advertisements for Pioneer’s broadband internet access service can be found in local newspapers, on television, on billing inserts and on the radio. Pioneer also frequently advertises by providing sponsorship to area high school events and other community activities. The attached document is an example of ads that were distributed in the Proposed Service Area.

In conclusion, Pioneer Communications re-emphasizes the fact that it offers broadband internet access to any customer within its wireline service area. Pioneer believes that its existing broadband penetration precludes its territory in Kearny County from being labeled underserved. As demonstrated in this response, Pioneer asserts that its territory in Kearny County is well-served by broadband internet access and the above referenced application does not meet the conditions as set forth in the NOFA.
Submitter: United Telephone Assn.

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s wireless EVDO RevA network supports wireless broadband at speeds up to 3.1 Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.

-----Service Area: OK_Cherokee

Submitter: Cross Wireless L.L.C.

Comment: Cross Wireless, LLC, has been offering broadband speed data service to its subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the wireless service area is served with high speed internet broadband service.

Submitter: Windstream
**Comment:** Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

**Submitter:** Salina Spavinaw Telephone Company, Inc.

**Comment:** The area that Salina Spavinaw Telephone Company, Inc., serves is neither underserved or unserved. We have purchased new equipment since June 30, 2009 that will enable our company to serve at least 90% of households in this service area. The service will be downloads of at least 768K and up to 3.0Mbps.
-----Service Area: UT_Toele

Submitter: Central Telcom Services, LLC

Comment: Central Telcom Services, LLC dba CentraCom Interactive provides 5 mg high speed internet service, as well as video and voice services to communities throughout Sanpete County, Utah.

Submitter: Wirelessbeehive.com

Comment: This area is current not underserved. Wirelessbeehive.com serves this area with high speed internet.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, UT_Toele for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: WA_Douglas

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 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.
Service Area: OR_Malheur

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: Oregon Telephone Corporation

Comment: Respondent provides broadband services to a portion of the Applicant's overlapping proposed funded service area indicated on the attached map.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Malheur 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ND_Wells

Submitter: Dakota Central Telecommunications

Comment: Dakota Central Telecommunications demonstrates that it provides broadband service throughout Wells County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 95% of households in Dakota Central’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 Dakota Central; 95% of the households in Dakota Central’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; Dakota Central 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: North Dakota Telephone

Comment: North Dakota Telephone Company (NDTC) service territory overlaps approximately 79% of the Satellite Broadband Application LLC Wells proposed funded service area (PFSA). The area is designated as underserved. NDTC serves more than 50% of the PFSA. NDTC provides the entire overlap area with service that is advertized and 20 Meg in part of the area. NDTC’s broadband penetration is close to 40% so when combined with other incumbents it is expected that the entire area will be fully served.

-----Service Area: MN_Grant

Submitter: Park Region Mutual Telephone Company

Comment: The applicant incorrectly claims the area served by our company as unserved and underserved. 100% of the establishments in our serving territory have access to facilities-based, terrestrial 3Mb plus internet. The rate of broadband subscribership for this area is 48%.

Submitter: Runestone Telephone Association

Comment: Satellite Broadband ARRA Application LLC's proposed project for Grant County covers the Hoffman, Wendell, Elbow Lake, Norcross and Barrett exchanges that is currently served by Runestone Telephone Association. We currently serve the exchange by an existing copper / fiber-to-the-home network. In the public notice response Runestone Telephone Association is providing; 1) a map of the overlapping area Runestone provides broadband services, 2) Runestone'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.
-----Service Area: NE_Frontier

Submitter: ATCJet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: ATC Communications

Comment: Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATC is capable of offering broadband service to all the households in its service territory.

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant’s PFSA contains 1175 households of which 727 households or 62 percent have access to broadband from Consolidated. Therefore, the PFSA does not qualify as underserved based on the availability criterion. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.
As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSA would still be underserved by the applicant’s definition, (which Consolidated disputes). This application should be rejected.

-----Service Area:   MO_Gentry

Submitter:   GVNW Consulting, Inc

Comment:   Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM’s territory is neither unserved nor underserved.

Submitter:   Windstream

Comment:   Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several
years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: MT_Daniels

Submitter: Nemont Telephone Cooperative, Inc.

Comment: The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is not aware of broadband services provided by others in the area. Nemont can demonstrate that for the area served by Nemont in the proposed funded service area that the designation of "unserved" is not applicable. The services that Nemont offers and provides in this proposed funded service area far exceed the thresholds set of more than 10% of households having access to broadband service (as defined in the NOFA).

-----Service Area: OK_Lincoln
Submitter: Dobson Telephone Company

Comment: Dobson Telephone Company challenges the application of Satellite Broadband ARRA Application LLC based on their declaration of the serving area being underserved.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Central Oklahoma Telephone Co.

Comment: Central Oklahoma Telephone Company has been offering broadband speed data service to subscribers for 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.
Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.
-----Service Area:  KS_Leavenworth

Submitter:  Sunflower Broadband

Comment:  Sunflower Broadband is commenting to the stimulus application of Satellite Broadband ARRA Application LLC for the proposed funded service area identified in the application as “KS_Leavenworth”. Within the proposed service area, Sunflower Broadband provides broadband services that meet and exceed the speeds defined in the NOFA. Sunflower Broadband’s full facilities-based broadband service is provided through an HFC network. The current functionality and future capability exceeds the technology proposed by Satellite Broadband ARRA Application LLC. Sunflower Broadband is also providing wireless service in portions of the proposed service area of "KS_Leavenworth". Because the wireless product has been available for 4 years, Sunflower Broadband has experience with the topographic challenges as there are areas where terrain is not conducive to a wireless option and in our experience at least 50% of homes in the area cannot be reached with a wireless option. In addition to Sunflower Broadband, there are at least two other existing wireless Internet options in the proposed service area.

-----Service Area:  KS_Stevens

Submitter:  Pioneer Communications, Inc.

Comment:  Pioneer Communications, a wireline telecommunications provider serving ten counties in western Kansas, has connected rural communities for more than five decades, and today delivers telephone, cable television and high-speed Internet service. Pioneer first became an Internet Service Provider (ISP) in 1995 by introducing educational Internet networking services for the schools located in its service area, and soon thereafter, made Internet access available commercially to Pioneer's telephone customers. Currently, Pioneer provides broadband internet access to 100% of its wireline service area using Digital Subscriber Line (DSL) over its telephony infrastructure, and data over cable modems via its cable television system.

The Proposed Service Area for the referenced application covers all of Stevens County, except for an area near the town of Hugoton, nearly all of which is falls within Pioneer Communications’ wireline service area. Pioneer offers broadband not only to those customers living within city limits, but also to households and businesses located in the far reaches of its territory in Stevens County. Pioneer’s rate of broadband subscribership for the proposed service area is greater than 40 percent of households.
Pioneer consistently and effectively advertises the availability of its broadband internet access throughout the Stevens County area. For example, advertisements for Pioneer’s broadband internet access service can be found in local newspapers, on television, on billing inserts and on the radio. Pioneer also frequently advertises by providing sponsorship to area high school events and other community activities. The attached document is an example of ads that were distributed in the Proposed Service Area.

In conclusion, Pioneer Communications re-emphasizes the fact that it offers broadband internet access to any customer within its wireline service area. Pioneer believes that its existing broadband penetration precludes its territory in Stevens County from being labeled underserved. As demonstrated in this response, Pioneer asserts that its territory in Stevens County is well-served by broadband internet access and the above referenced application does not meet the conditions as set forth in the NOFA.

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.
Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Hugoton will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

-----Service Area: UT_Washington

Submitter: South Central Utah Telephone Association

Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service in portions of Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant’s characterization of portions of Washington county, Utah as being underserved is entirely without merit. In 2007, we engaged an independent market research firm to determine, among other things, broadband adoption rates in the St. George, Utah BTA, which includes all of Beaver, Garfield, Iron, Kane and Washington counties. It was determined with a 95% Confidence Level and a Confidence Interval of +/- 5% that Broadband adoption in the St. George BTA was 56%. Clearly the area is not underserved.

Submitter: Baja Broadband Operating Company LLC

Comment: Baja Broadband provides cable modem service in Hurricane, Ivins, St. George, Santa Clara, LaVerkin and Leeds at speeds up to 10 Mbps. Other broadband providers in the service area include Qwest (DSL), Infowest (wired 7 Mbps, wireless 3x256), and SkyView (wireless 3x512). St. George is also served by Prime Time Communications (wired, FTTH).
Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, UT Washington 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NE_Pierce

Submitter: Pierce Telephone Company, Inc.

Comment: For the portion of this application that overlaps the Pierce Telephone Company, Inc. serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Pierce Telephone Company, Inc. offers 3Mbps, 8Mbps, 10Mbps, and 12Mbps service in this area. Lastly, Pierce Telephone Company, Inc. combined with its primary competitor, Cable One, supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: Cable One, Inc.

Comment: NE_Pierce - Norfolk - 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: Plainview Telephone Company

Comment: Plainview Telephone Company (PTC) offers FTTP broadband internet service with up to 6 Mbps download speed and up to 2 Mbps upload speed. PTC is capable of delivering FTTP broadband service to all households in its service territory.
-----Service Area:  OK_Kay

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: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

-----Service Area: NV_Douglas

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.

-----Service Area: OK_Atoka

Submitter: James Cable LLC

Comment: James Cable provides 8Mb broadband service to Atoka, Oklahoma. We provide 3Mb service to Tushka, Oklahoma.
Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (‘’mbps’’) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: KS_Clay
Submitter: Twin Valley Telephone, Inc.

Comment: Twin Valley Telephone, Inc. ("TVT") is an Incumbent Local Exchange Carrier ("ILEC") that has provided communications services in north-central Kansas since 1947 and has participated in multiple RUS programs. With a state-of-the-art broadband network featuring fiber-to-the-premises ("FTTP") and ADSL2+ infrastructure, TVT has the ability to provide broadband services to 100% of the households and businesses within its 2400 square mile service territory. In approximately two-thirds of its territory, TVT can provide broadband service at speeds of up to 100 mbps to every household with its FTTP architecture. In the remaining one third of its territory, TVT can provide broadband service at speeds of at least 8 mbps and up to 25 mbps. TVT’s broadband service has been enthusiastically embraced by its customers, and its rate of broadband subscribership is well in excess of 40%.

TVT does not believe that Satellite Broadband ARRA Application LLC’s ("Satellite Broadband") characterization of its proposed service area as underserved is accurate. Although TVT is not privy to any of the underlying data upon which Satellite Broadband purports to demonstrate that the area is underserved, the information provided in this Response strongly suggests that the proposed service area is not underserved as that term is defined in the Notice of Funding Availability ("NOFA") published in the July 9, 2009, Federal Register.

Submitter: Twin Valley Communications, Inc.

Comment: Twin Valley Communications, Inc. ("TVC") is a Competitive Local Exchange Carrier ("CLEC") that has provided broadband Internet services in north-central Kansas for many years. TVC is operated under joint management with Twin Valley Telephone, Inc. ("TVT"), which has provided communications services in the area since 1947 and has participated in multiple RUS programs. With a state-of-the-art broadband network featuring fiber-to-the-premise ("FTTP") and WiMax infrastructure via licensed 700 MHz spectrum, TVC has the ability to provide broadband services to 100% of the households and businesses within its 180 square mile service territory. In approximately two-thirds of its territory, TVC can provide broadband service at speeds of up to 100 mbps to every household with its FTTP architecture. In the remaining one third of its territory, TVC can provide broadband service at speeds up to 6 mbps. TVC competes in this market with two other broadband providers, who provide up to 3.0 mbps broadband access in Clay Center. TVC also provides broadband access outside of the city limits to 100% of the homes and businesses in its CLEC territory. With three competing broadband providers in the area, the rate of broadband subscribership is well in excess of 40%.
TVC does not believe that Satellite Broadband ARRA Application LLC’s ("Satellite Broadband") characterization of its proposed service area as underserved is accurate. Although TVC is not privy to any of the underlying data upon which Satellite Broadband purports to demonstrate that the area is underserved, the information provided in this Response strongly suggests that the proposed service area is not underserved as that term is defined in the Notice of Funding Availability ("NOFA") published in the July 9, 2009, Federal Register.

-----Service Area:  WA_Asomin

Submitter:  Cable One, Inc.

Comment:  WA_Asomin - Lewiston - 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.

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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.

-----Service Area: KS_Hodgeman

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest
consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.

Submitter: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.
-----Service Area: NE_Hitchcock

Submitter: BWTelcom

Comment: Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of households have access to Broadband service of at least 768/200 Kbps. The current residential take rate of Broadband at a speed of 768/200 Kbps or higher is 43% of households. BWTelcom offers a 5 Mbps service.

-----Service Area: IA_Decatur

Submitter: Mediacom Communications Corporation

Comment: A large number of households in applicant's proposed service area are currently served by Mediacom. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant's proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up 20 Mbps.

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: CO_Ouray
Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Ouray for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ND_Eddy

Submitter: North Dakota Telephone

Comment: • North Dakota Telephone Company (NDTC) service territory overlaps approximately 100% of the Satellite Broadband Application LLC Eddy County proposed funded service area (PFSA). Satellite Broadband Application LLC designates a portion of the area as underserved. This is not accurate since NDTC serves the entire area. In the overlapping area, NDTC service advertises 6 meg service and penetration is close to 40%. Therefore the Satellite Broadband Application should be rejected.

Submitter: North Dakota Telephone Company

Comment: • North Dakota Telephone Company (NDTC) service territory overlaps approximately 100% of the Satellite Broadband Application LLC Eddy County proposed funded service area (PFSA). Satellite Broadband Application LLC designates a portion of the area as underserved. This is not accurate since NDTC serves the entire area. In the overlapping area, NDTC service advertises 6 meg service. Therefore the Satellite Broadband Application should be rejected.

Submitter: Dakota Central Telecommunications

Comment: Dakota Central Telecommunications demonstrates that it provides broadband service throughout Eddy County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 95% of households in Dakota Central’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 Dakota
Central; 95% of the households in Dakota Central’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; Dakota Central 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.

-----Service Area:  ND_Adams

Submitter:  West River Telephone Cooperative Company

Comment:  West River Telephone Cooperative Company demonstrates that it provides broadband service to a portion of Adams County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in West River’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 West River; 100% of the households in West River’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:  Consolidated Telcom

Comment:  Consolidated Telcom service territory overlaps approximately 35% of the Satellite Broadband Application LLC Adams proposed funded service area (PFSA). Satellite Broadband Application LLC designates this area as underserved. In the overlapping area, Consolidated service advertises 20 meg service. The penetration for Consolidated alone is reasonable in the area so when combined with other providers the total penetration maybe over 40%.
Service Area: OK_Greer

Submitter: Cable One, Inc.

Comment: Satellite Broadband ARRA Application LLC Greer County, Mangum, Oklahoma and surrounding areas.

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: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: SD_Moody

Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Moody County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application.

As demonstrated, 100% of households in ITC’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 ITC; 100% of the
households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

-----Service Area:  CO_ClearCreek

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Clear Creek for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  ID_Franklin

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: Directo Communications Cable

Comment: Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least to 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6.0 Mbps download and 1.0 Mbps upload in certain service areas. It appears that Satellite Broadband ARRA’s application overlaps the company’s area of service that includes the community of Clifton, Dayton, Franklin, Preston, and Weston and DCC believes that this area of service is neither unserved or underserved in broadband services.
**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

------Service Area: NM_Debaca

**Submitter:** Plateau

**Comment:** ENMR currently serves much of De Baca County with DSL as part of its telephone service area.

------Service Area: CO_Eagle

**Submitter:** CenturyLink

**Comment:** CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our
The average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

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**Service Area:** NE_Gosper

**Submitter:** ATCJet.net LLC

**Comment:** ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

**Submitter:** ATC Communications

**Comment:** Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly
pricing plans begin at an affordable rate of $29.95. ATC is capable of offering broadband service to all the households in its service territory.

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA. One hundred percent of the customers to which Consolidated provides landline telephone service within the PFSA are broadband capable. Broadband stimulus funds can be used more effectively elsewhere.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

Submitter: Applied Communications Technology Inc

Comment: Applied Communications Technology provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. Applied Communications Technology does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. Applied Communications Technology is capable of offering broadband service to all the households in its service territory.
-----Service Area: NE_Dundy

Submitter: BWTelcom

Comment: Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, currently provides service inside its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least 768/200 Kbps. The current residential take rate of Broadband service of at least 768/200 Kbps or higher is 48% of households. BWTelcom offers a 5 Mbps service.

-----Service Area: WA_SanJuan

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.
CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  OK_Craig

Submitter:  Cable One, Inc.

Comment:  Satellite Broadband ARRA Application LLC Craig County, Vinita, Oklahoma and surrounding areas.
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: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: OR_Umatilla

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.
This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

**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 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.
-----Service Area:  MN_Pennington

Submitter:  Garden Valley Telephone Company

Comment:  Garden Valley Telephone Company ("GVTC"), a small rural operator and Rural Utilities Service ("RUS") Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application, LLC ("Satellite BB") proposed funded service area in the county of Pennington, MN. Satellite BB has proposed broadband service for this area and it is already served by GVTC.

-----Service Area:  MT_Carbon

Submitter:  Project Telephone Company, Inc. dba Nemont

Comment:  The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is not aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA) and a broadband subscription rate of more than 40%.

-----Service Area:  NV_CarsonCity

Submitter:  Charter Communication

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:** 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.

-----**Service Area:** AZ_Yavapai

**Submitter:** NPG Cable, Inc.

**Comment:** NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

**Submitter:** TableTop Telephone Company

**Comment:** Table Top Telephone Company, Inc. believes the applicant for Broadband Stimulus Funding should be denied.

**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 applicable system, 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:** Table Top Telephone Company, Inc.

**Comment:** Table Top Telephone Company, Inc. believes Satellite Broadband’s application for Broadband Stimulus Funding in the Bagdad, AZ area should be denied.
----Service Area: TX_Hardeman

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

----Service Area: MT_Chouteau

Submitter: Triangle Telephone Cooperative

Comment: Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies.

Submitter: 3 Rivers Telephone Cooperative, Inc.

Comment: This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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: Central Montana Communications

Comment: Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies.
Service Area: ND_Burleigh

Submitter: BEK Communications Cooperative

Comment: Satellite Broadband ARRA’s proposed project covers exchanges served by BEK Communications Cooperative. BEK currently serves all its exchanges by an existing fiber network that extends from our corporate headquarters in Steele, ND. In this public notice response BEK is providing; 1) a map of the overlapping area where BEK provides broadband services, 2) BEK’s DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from BEK within its service territory, 4) the number of residential households and business establishments subscribing to BEK’s broadband service within the proposed service area, 5) the advertised download and upload speeds and service rates, and 6) comments addressing the existing services offered within the proposed funded service area.

Service Area: MT_McCon

Submitter: Mid-Rivers Communications

Comment: As shown on our response map, many areas of McCon County, Montana, including the communities of Circle and Vida, are NOT UNDERSERVED as the Applicant has indicated. Mid-Rivers Communications is the Incumbent Local Exchange provider in Circle and the balance of McCon County, and Circle is also our Cooperative Headquarters. We currently provide and advertise broadband speeds of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Circle; 3 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in the Vida/South Wolf Point area; and broadband meeting or exceeding the NOFA definition in other areas of the County indicated on the response map. We have been providing affordable, reliable wireline broadband to the schools, ambulance services, fire departments, and other vital community facilities in these areas for several years utilizing existing funding sources, and have plans to build Fiber to the Premise (FTTP) facilities in these Exchanges in the future utilizing a recently-approved Rural Utilities Service (RUS) loan.

Service Area: CA_Alpine
Submitter: Volcano Communications Group

Comment: Based on the definition of unserved and underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the California community of Kirkwood is neither unserved nor underserved and does not qualify for Broadband Stimulus funds. Volcano Communications Group (Volcano) provides broadband to 95% of the residences and businesses in Kirkwood, Ca. Data to further substantiate this response can be found in the comments section below.

-----Service Area: MO_Daviess

Submitter: windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum
broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second ("mbps") downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Green Hills Telephone Corp, dba: Green Hills Co’s

Comment: • 100% of Green Hills’ service area has access to facilities based Broadband in excess of 768k down/200 up speeds.

• Green Hills’ advertises and provides multiple service speeds including an offering with 3 Meg down.

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: KS_Morris

Submitter: The Tri-County Telephone Association, Inc.

Comment: The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.
In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.
----Service Area:  SD_Day

Submitter:  Venture Communications Cooperative

Comment:  Venture Communications Cooperative demonstrates that it provides broadband service throughout the Day County area which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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:  Interstate Telecommunications Cooperative

Comment:  Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Day County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application and that the proposed funded Service Area is not unserved or underserved. As demonstrated, 100% of households in ITC’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 ITC; 100% of the households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is 2.4% of households. Monies are currently being expended to upgrade facilities to offer minimum 1.5Mbps and higher speeds to the entire service area.

Submitter:  James Valley Cooperative Telephone Company
Comment: James Valley Cooperative Telephone Company demonstrates that it provides broadband service throughout Day County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in James Valley’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 James Valley; 100% of the households in James Valley’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; James Valley 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.

-----Service Area: TX_Lubbock

Submitter: NTS Communications, Inc.

Comment: NTS Communications, Inc. is currently providing Broadband Services greater than 3 mbps to the communities of Lubbock, Wolfforth, and Reese Center, TX.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: KS_Ness

Submitter: GBT Communications
Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Submitter: United Telephone Assn

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s wireless EVDO RevA network supports wireless broadband at speeds up to 3.1 Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.
United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy.

Service Area:  KS_Lyon

Submitter:  The Tri-County Telephone Association, Inc.

Comment:  The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.
Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter:  S&A Telephone Company

Comment:  This grant proposes to bring satellite broadband internet service to all or parts of 20 states. The vast majority of the locations covered by this grant already have broadband today and this grant doesn’t pay the slightest bit of attention to the grant rules. It characterizes these areas as underserved when, in fact, a majority of the homes, businesses and anchor institutions within this footprint are already served with broadband today. This grant seems to assume that rural automatically means unserved and underserved, when in fact most of the proposed service area already has broadband.

For example, this grant request proposes to completely cover the service territory of S&A Telephone Company. S&A is an incumbent rural telephone company that has been serving this area for over 80 years. S&A has been granted a franchised area to serve, and since it has been willing to serve a very poor and rural area also has been given a federal exemption against competition. Small rural areas like the one served by S&A need a barrier against competition to ensure that people in the area can continue to get service for the next century. S&A has kept rates low and has brought advanced services and broadband to this rural area when nobody else was willing to make investments in such an impoverished area.

The S&A service territory is ‘served’ today using the definitions of the NOFA since the company has 1) more than a 40% broadband penetration, and 2) advertises broadband speeds of 3 Mbps.  
Our knowledge of the telephone and cable industry tells us that this grant also proposes to bring broadband to many areas where AT&T, Qwest, various cable companies, and many other small telephone companies already provide broadband today.

This grant should be rejected in its entirety for not adhering to the grant guidelines for serving mostly unserved and underserved areas. We believe that the vast majority of residences and businesses covered by this proposed grant are ‘served’ with broadband using the definitions defined in the NOFA. This grant seems to think that rural equates to ‘underserved ‘ and ‘unserved’ as defined in the NOFA. This is not the case and the county seats, other towns and most census designated areas within these 33 counties already have broadband today and are not eligible for grant funding. The NOFA allows using only a small portion of any grant to cover served areas, but this grant seeks to use grant money to bring broadband mostly to places that are defined as ‘served’ under the NOFA. Again, this grant request should be rejected.
There are other problems with this grant. One issue with satellite broadband is the availability of upload speeds. Broadband as defined by the FCC has two components that must be met in order to qualify as broadband – download speed and upload speed. Most residential satellite service today does not qualify as broadband because of the paltry upload speeds available to customers. Many customers must use dial-up links over a telephone line to complete the upload link, and using the very slow speeds of dial-up disqualifies such a service from being considered as broadband. Even links directly from customers to the satellite are usually of dial-up type speeds. Good upload speeds are essential for a service to be considered as broadband. These grants have the goal of promoting economic development in rural areas. This means bringing broadband to rural businesses, but also bringing decent broadband to homes so that people can work from home. Over 80% of the new jobs created in the last decade have been created by small businesses, and a very large percentage of those new jobs have been created by people working out of their homes. Satellite broadband does not provide the kind of broadband that allows somebody to work from their home. People typically buy satellite broadband only when they have no alternative since the technology and service are inferior to all other types of broadband technologies.

Satellite broadband also has another significant drawback that limits its usefulness for economic development. All of the residential and small business satellite products available today place a monthly cap on the amount of total bandwidth that a customer can use. For example, a customer might be limited to 5 gigabits of total bandwidth for downloading and uploading combined. For anybody who does anything greater than reading emails and light web browsing, this bandwidth cap greatly reduces the possibility of using the satellite service for conducting business or working from the home.

Another problem with satellite broadband is the cost to customers. The typical residential satellite service today costs around $70 per month while having paltry upload speeds and a cap on monthly usage. Federal grant funds should not be used to promote this kind of expensive and inferior product.

Another problem with the grant is the amount of funding they are seeking. This grant request is asking for 75% grant funding. Under the most liberal interpretation of the NOFA grant rules, this grant would be at best eligible for 50% grant funding since it covers both non-remote areas and non-rural areas. However, since it proposes to bring broadband to many served areas it ought to be rejected and get no grant funding.

While this is an interesting proposal, this project should not be funded. This one project seeks to get a very large percentage of all of the available grant money, and would use this money to create an inferior broadband product. This technology is flawed. Customers in these states today already have satellite broadband available to them and federal grant funds should not be used to subsidize a second entry into a market that uses inferior technology and that charges too high a price for broadband.

Submitter: TC Wireless
Comment: TC Wireless, Inc, along with its parent company The Tri-County Telephone Association, Inc., has been providing communications services to rural Kansas for over 46 years. TC Wireless was formed in 2004 specifically to provide wireless broadband services to communities that larger companies ignored. TC Wireless is a pioneer in providing high-quality services over the 700 Mhz wireless spectrum. It acquired its licenses at auction in 2002, taking a chance on the unproven spectrum. It began providing services in this band as soon as equipment was available. To meet the specific needs of the communities it serves, TC Wireless has expanded its offerings to include the 900 MHz and 2.4 MHz bands.

By utilizing an array of licensed and unlicensed spectrum, TC Wireless achieved a task five years ago that some still say today is not possible – bringing high speed Internet access to rural and remote areas. It did this, at considerable cost, because, as a local company, TC Wireless’ owners, who are also its customers, have a personal stake in the communities where they work and live. As a result, TC Wireless is providing rural America with advanced, reliable communications service.

Submitter: Wheat State Telephone, Inc

Comment: Wheat State Telephone has been serving this rural community in south Kansas for almost 60 years. Some of our service areas are in the heart of sparsely populated cattle country, yet we are committed to delivering high speed broadband service to all of our customers. Wheat State Telephone was the first provider of broadband service in the area as early as July, 2000. Since then we have continually upgraded our network to bring higher speeds to more and more of our subscribers. Wheat State Telephone continues to be a leader in broadband services. Based on the NOFA definition of broadband this community is neither unserved nor underserved.

Wheat State Telephone is a community based company, with just under 50% of its staff being residents of the communities we serve. Our employees are active in the communities, volunteering with numerous events and serving on various local boards or committees.

Submitter: Cable Ohe, 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.
-----Service Area:  KS_Douglas

Submitter:  Sunflower Broadband

Comment:  Sunflower Broadband is commenting to the stimulus application of Satellite Broadband ARRA Application LLC for the proposed funded service area identified in the application as “KS_Douglas”. Within the proposed service area, Sunflower Broadband provides broadband services that meet and exceed the speeds defined in the NOFA. Sunflower Broadband’s full facilities-based broadband service is provided through an HFC network. The current functionality and future capability exceed the technology proposed by Satellite Broadband ARRA Application LLC. Sunflower Broadband is also providing wireless service in portions of the proposed service area of "KS_Douglas". Because the wireless product has been available for 4 years, Sunflower Broadband has experience with the topographic challenges as there are areas where terrain is not conducive to a wireless option and in our experience at least 50% of homes in the area cannot be reached with a wireless option. In addition to Sunflower Broadband, there are at least two other existing wireless Internet options in the proposed service area.

Submitter:  Mercury Wireless, LLC

Comment:  Mercury Wireless currently provides up to 3 mbps wireless Internet access to sections of the applicant’s proposed service area.

-----Service Area:  ID_Owyhee

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:

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- 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.

-----**Service Area:** NM_SanMiguel
Submitter: ENMR Telephone Cooperative, Inc.

Comment: ENMR currently serves much of San Miguel County with DSL as part of its telephone service area.

-----Service Area: TX_Carson

Submitter: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Groom, Panhandle, White Deer, and Skellytown Texas for which funds are being requested in this application, we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

-----Service Area: CO_Washington

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: NE_Garfield

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) believes that the applicant Satellite Broadband LLC has misinterpreted the availability of Broadband Internet access service in the response polygon area that represents the respondent’s service area. The respondent is a Local Exchange Carrier (Common Carrier) that offers wireline facilities based Broadband (high speed) Internet access service in the overlap area of the PFSA.

Respondent can provide Broadband Internet access service exceeding 768K downstream and 200K upstream speeds to over 98% of the households and businesses in its response polygon. In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream. The advertising copy shows that the basic package of Broadband offered by the respondent exceeds the minimum speeds for categorization of a PFSA as “unserved”. As such, the applicant’s request for funds based on the area being “unserved” should be rejected.

In some cases, respondent does not cover an entire zip code with its response polygon, although the business counts generated by the system include all businesses in a reported zip code. As a result some of the business counts reflected in the “Businesses in Zip codes in Polygon” count are not included in respondent’s response polygon (overlap area).
Submitter: Hamilton.net, Inc.

Comment: Hamilton.net just began offering stationary unmetered broadband services using 3G 1XEVDO/Rev A in this location. Our brand name for this service is "GMAX". This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service. The number of businesses listed within the zip code(s) associated with our response are severely skewed and cannot be used for any legitimate analysis.

Service Area: IA_Webster

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: Mediacom Communications Corporation

Comment: A large number of households in applicant's proposed service area are currently served by Mediacom. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant's proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up 20 Mbps.

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: Webster-Calhoun Cooperative Telephone Association

Comment: Webster-Calhoun Cooperative Telephone Association demonstrates that it provides broadband service throughout Webster County which is encompassed in the proposed funded Service
Area in the Satellite Broadband ARRA Application LLC 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.

-----Service Area:  NE_Lincoln

Submitter:  ATCJet.net LLC

Comment:  ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter:  Hershey Cooperative Telephone Co.

Comment:  All customers in the Hershey Telephone exchange are 100% capable of receiving 3 meg. down and 768k up.

Submitter:  ATC Communications

Comment:  Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATC is capable of offering broadband service to all the households in its service territory.
Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant’s PFSA contains 9638 claimed underserved households of which 760 households have access to broadband from Consolidated. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

Submitter: Hamilton.net, Inc.

Comment: Hamilton.net has been offering stationary unmetered broadband services using 3G 1XEVDO/Rev A in this location for roughly 4.5 years. Our brand name for this service is “GMAX”. This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service. Hamilton.net has also been offering broadband services using 5700 MHz unlicensed wireless equipment in this area for several years.

-----Service Area: MO_Cass
**Submitter:**  MoKan Dial Telephone

**Comment:**  MoKan Dial, Inc. demonstrates that the area the Applicant proposes to serve which overlaps MoKan Dial, Inc.’s service area does not meet any of the criteria which categorize an area as unserved or underserved.

As demonstrated, 80% of households in MoKan Dial, Inc.’s service area, including those areas which are part of the Applicant’s proposed funded 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 MoKan Dial, Inc. Therefore, the Applicant’s claim that this overlapping area is underserved due to limited access is incorrect. In addition, MoKan Dial, Inc. demonstrates that it advertises speeds of at least 3 Mbps downstream in its service area and that the rate of broadband subscribership for Cass County is significant.

----- **Service Area:**  ID_Jerome

**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: Safelink Internet
Comment: Jerome County is already served by 5 last mile providers.

Submitter: Qwest
Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.
-----Service Area: UT_Wasatch

Submitter: All West Communications

Comment: All West Communications provides broadband DSL and Ethernet services to locations within Wasatch County Utah. These locations include Woodland, Red Ledges, Timberlakes, Victory Ranch, Jordanelle, Star Harbor, Fox Bay, Deer Mountain, Todd Hollow and Wolf Creek.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ID_Washington

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:** Cambridge Telephone Company, Inc

**Comment:** Cambridge Telephone has fiber to the node facilities in this study area that will delivers services that exceed the required broadband speeds to meet requirements of an underserver area.

**Service Area:** NE_Custer

**Submitter:** Consolidated Companies Inc.
Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant seeks funding for Custer County, asserting that some portions of the county are unserved, and some are underserved. As shown by Consolidated’s response broadband coverage map, 100 percent of the households have access to broadband, as defined within Consolidated’s coverage and do not qualify as underserved based on the availability criterion. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. The same holds true for the portion of the PFSA the applicant claims as unserved. This application should be rejected. Broadband stimulus funds can be used more effectively elsewhere.

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 1,223 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.
In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

Submitter: Cozad Telephone Company

Comment: Cozad Telephone Company (CTC) provides wireline and wireless high speed broadband internet service at 3 Mbps downstream and 1 Mbps upstream. CTC is capable of delivering broadband internet to 100% of the households in its service territory.

-----Service Area: CO_Sedgwick

Submitter: PC Telcorp dba PC Telcom

Comment: Phillips County Telephone Company (PCTC) is a small, progressive, cooperative Rural Local Exchange Carrier (RLEC) located in Holyoke, Colorado. PCTC and its subsidiaries, Phillips County Communications, LLC (PCC, LLC) and PC Telcorp, Inc. (Telcorp) provide broadband Internet access ranging from 512 kbps down to 3 Mbps down to the entire service area for PCTC as well as the neighboring rural communities of Fleming, Haxtun, Julesburg, and Ovid, Colorado. All three entities are doing business as PC Telcom. Overall, greater than sixty percent of PC Telcom’s customers subscribe to speeds of 768 kbps down or greater. PC Telcom is one of the largest employers in northeastern Colorado and projects increasing its staff at an annual rate of two percent.

In keeping with its long tradition of providing cutting-edge technologies and after substantial investments in network infrastructure and facilities, one hundred percent of PC Telcom’s customers can enjoy broadband access. PC Telcom utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. These include Fiber to the Premise (FTTP), DSL, cable modem and unlicensed wireless.
PC Telcom provides broadband and Ethernet services to most anchor tenants in the communities within its service areas. These entities include all secondary schools; all County Government offices; hospitals and other health care facilities; and large businesses. In addition to Internet access at broadband speeds, PC Telcom also provides state-of-the-art Ethernet services to business customers at affordable rates.

PC Telcom has been the technology leader in northeast Colorado for its one hundred plus years of existence and is looking forward to continuing its excellent customer service record. PC Telcom was one of the first broadband providers in northeast Colorado and now relies on 10 years of experience delivering services to difficult to serve areas that larger providers ignore. PC Telcom is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and support and local offices. It serves from a local perspective because PC Telcom’s owners, who are its customers, have a personal stake in the communities where they work and live.

**Submitter:** Phillips County Communications dba PC Telcom

**Comment:** Phillips County Telephone Company (PCTC) is a small, progressive, cooperative Rural Local Exchange Carrier (RLEC) located in Holyoke, Colorado. PCTC and its subsidiaries, Phillips County Communications, LLC (PCC, LLC) and PC Telcorp, Inc. (Telcorp) provide broadband Internet access ranging from 512 kbps down to 3 Mbps down to the entire service area for PCTC as well as the neighboring rural communities of Fleming, Haxtun, Julesburg, and Ovid, Colorado. All three entities are doing business as PC Telcom. Overall, greater than sixty percent of PC Telcom’s customers subscribe to speeds of 768 kbps down or greater. PC Telcom is one of the largest employers in northeastern Colorado and projects increasing its staff at an annual rate of two percent.

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PC Telcom provides broadband and Ethernet services to most anchor tenants in the communities within its service areas. These entities include all secondary schools; all County Government offices; hospitals and other health care facilities; and large businesses. In addition to Internet access at broadband
speeds, PC Telcom also provides state-of–the-art Ethernet services to business customers at affordable rates.

PC Telcom has been the technology leader in northeast Colorado for its one hundred plus years of existence and is looking forward to continuing its excellent customer service record. PC Telcom was one of the first broadband providers in northeast Colorado and now relies on 10 years of experience delivering services to difficult to serve areas that larger providers ignore. PC Telcom is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and support and local offices. It serves from a local perspective because PC Telcom’s owners, who are its customers, have a personal stake in the communities where they work and live.

-----Service Area: OR_Grant

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our
data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Oregon Telephone Corporation

Comment: Respondent provides broadband services to a portion of the Applicant's overlapping proposed funded service area indicated on the attached map.

-----Service Area: MT_Glacier
Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: 3 Rivers Telephone Cooperative, Inc.

Comment: This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.
----Service Area: IA_O'Brien

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: Evertek, Inc

Comment: Evertek 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: The Community Agency

Comment: Satellite Broadband ARRA overlaps some of TCA wireless Internet service area.

Submitter: C-M-L Telephone

Comment: Broadband funding for the Iowa exchange of Archer should be funded through the C-M-L Telephone Cooperative application rather than the Satellite Broadband ARRA Application, LLC application. Data to further substantiate this response can be found in the comments section below.

Submitter: WesTel Systems

Comment: WesTel Systems demonstrates that it provides broadband service throughout the Sutherland area which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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.

-----Service Area:  ND_Ramsey

Submitter:  North Dakota Telephone

Comment:  • North Dakota Telephone Company (NDTC) service territory overlaps 100% of the Satellite Broadband Application LLC Ramsey County proposed funded service area (PFSA). Satellite Broadband Application LLC Ramsey County designates this area as underserved. In the overlapping area, NDTC service advertises 30 meg service. The penetration for NDTC penetration is over 40%. Therefore, this PFSA does not meet the definition of underserved.

-----Service Area:  KS_Comanche

Submitter:  United Telephone Association

Comment:  United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and
local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy.

Submitter:  Haviland Telephone Co., Inc.

Comment: Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Comanche County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes the towns of Wilmore and adjacent rural areas, and rural areas of the telephone exchange area of Mullinville.

-----Service Area:  ID_Custer

Submitter:  Custer Telephone Cooperative, Inc.

Comment: Custer Telephone Cooperative, Inc. has provided Broadband service in the identified map area for the past several years. We currently provide Broadband service with the following technologies: Fiber to the node (DSL), Fiber to the Home (FTTH). Our primary capital funding source to invest in the latest broadband technology is the United States Department of Agriculture’s RUS (Rural Utility Service) program. The other broadband providers that we compete with in areas we serve are Verizon Wireless, Alltel Wireless, AT&T Wireless, and Wild Blue Satellite. We respectfully request Satellite Broadband ARRA Application LLC’s application be denied for the following reasons: (1) Affordable Broadband service is being provided through funding from USDA’s RUS program, (2) Competition currently exists in the area, (3) The applicant failed to adequately research the area for existing providers and therefore provided incorrect or untrue information in their application.

-----Service Area:  OR_Morrow
Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our
average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application, Morrow for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: UT_Iron

Submitter: South Central Utah Telephone Association

Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service in portions of Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant's characterization of Iron county, Utah as being unserved and underserved is entirely without merit. In 2007, we engaged an independent market research firm to determine, among other things, broadband adoption rates in the St. George, Utah BTA, which includes all of Beaver, Garfield, Iron, Kane and Washington counties. It was determined with a 95% Confidence Level and a Confidence Interval of +/- 5% that Broadband adoption in the St. George BTA was 56%. Clearly the area is neither unserved nor underserved.

Submitter: Qwest
Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, UT Iron 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  KS_Butler

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 least ten years. Cox provides its customers in Kansas 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: The Southern Kansas Telephone Co., Inc.

Comment: The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT’s owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.
Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: MN_BigStone

Submitter: Federated Telephone Cooperative

Comment: i. Federated Telephone Cooperative service territory overlaps approximately 12% (based upon households passed) of the Satellite Broadband ARRA Application LLC – MN_BigStone proposed funded service area (PFSA). FTC provides service to more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, FTC provides service to the entire overlap area with service that is advertized at 3 Mbps or above. Federated has built a fiber to the premise network covering all of its exchanges.

-----Service Area: CA_Nevada

Submitter: WaveDivision Holdings, LLC

Comment: WaveDivision Holdings, LLC (“Wave”) is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC (“Applicant”) for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.
-----Service Area: MT_Stillwater

Submitter: Project Telephone Company, Inc. dba Nemont

Comment: The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA) and more than 40% broadband subscription rate.

Submitter: Triangle Communication

Comment: Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of unserved under the ARRA.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NE_Furnas

Submitter: ATCJet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps.
ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: ATC Communications

Comment: Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATC is capable of offering broadband service to all the households in its service territory.

-----Service Area: WA_GraysHarbor

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.
CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: CO_Baca

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.
CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter:  Rye Telephone Company

Comment:  Rye Telephone Company (RTC) has been providing high-quality communications services in the remote and rural communities of Rye, Colorado City and Kim, Colorado for 50 years. RTC has been offering broadband services since 2002 and can offer speeds up to 5 Mbps within its service areas.

In keeping with its long tradition of providing cutting-edge technologies, RTC utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. At considerable investment, RTC deployed a Fiber-to-the-Premise (FTTP) platform to serve the vast majority of its service areas.

RTC is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Because of RTC’s advanced network, important community anchor institutions including local and state government, public safety agencies, healthcare facilities, schools and libraries now have broadband services. Due to RTC’s entrepreneurial spirit, its dedication to its customers and through a substantial investment in advanced network facilities, these rural southern Colorado communities enjoy the same level of service as offered in metropolitan areas.


Service Area: OK_Coal

Submitter: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: James Cable LLC

Comment: James Cable LLC provides 3Mb broadband service to the communities of Coalgate and Tupelo, Oklahoma.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency
officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: IA_Warren

Submitter: Interstate 35 Telephone Company

Comment: Interstate 35 Telephone Company demonstrates that it provides broadband service throughout the St Marys Area which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.
As demonstrated, 100% of households in I 35’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 I 35; 100% of the households in I 35’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; I 35 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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, IA Warren for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: MT_BigHorn

Submitter: Project Telephone Company, Inc. dba Nemont

Comment: The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is not aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA) and advertising at least three megabits per second (3Mbs).

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications
found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area

Submitter:  Range Telephone Cooperative

Comment:  Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana.  Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH.  73% of Range’s serving area subscriber households and business locations are capable of 3mb service today.  Approximately 49% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Satellite Broadband ARRA Application LLC’s application for broadband funds support in Big Horn County Montana, their comments that the areas are unserved or underserved are not true.  We serve a part of Big Horn County and it is capable of 1.5 mb or higher broadband service to the households that we serve.  The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years.  Range used RUS loan funds to build the infrastructure in this area to get customers communication service.  Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area.  We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA Application LLC’s comments that
much of the area that they applied for is unserved or underserved are not true in the case of our service area in Big Horn County. Range has 2 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area:  NM_Sandoval

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: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded
service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: AZ_Navajo

Submitter: Cable One, Inc.

Comment: AZ Navajo Winslow Holbrook Showlow Systems - 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.

-----Service Area:  MN_Lincoln

Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Lincoln County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application and that the proposed funded Service Area is not unserved or underserved. As demonstrated, 100% of households in ITC’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 ITC; 100% of the households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is 1.5% of households. Monies are currently being expended to upgrade facilities to offer minimum 1.5Mbps and higher speeds to the entire service area.
-----Service Area: NE_Dodge

Submitter: WesTel Systems

Comment: WesTel Systems demonstrates that it provides broadband service throughout the Hooper and Uehling areas which are encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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.

-----Service Area: CO_Delta

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The towns of Delta, Orchard City and Cedaredge are served by Stelera Broadband, a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.
-----Service Area:  KS_Gove

Submitter:  Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment:  Rural Telephone Service Co., Inc., an RUS borrower since 1952, offers broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

Submitter:  GBT Communications

Comment:  Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.
-----Service Area:  KS_Sheridan

Submitter:  Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment:  Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

Submitter:  S&T Telephone Cooperative Associates

Comment:  S&T Telephone Cooperative Assn. currently provides Broadband service in its certificated exchange areas. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 30% of households. S&T Telephone Cooperative Assn. offers a 3 Mbps service. Therefore, S&T Telephone Cooperative Assn. service areas do not meet the ARRA NOFA classification of “Unserved.”

-----Service Area:  NM_Union

Submitter:  ENMR Telephone Cooperative, Inc.

Comment:  ENMR currently serves much of Union County with DSL as part of its telephone service area.

Submitter:  Baca Valley Telephone Company, Inc.

Comment:  Baca Valley Telephone Company, Inc. provides areas of rural Union County New Mexico with 1 MB downstream and 384 Kbps upstream DSL service. We currently provide DSL to the rural communities of Des Moines, Folsom, Greenville and Capulin. Based on the NOFA definition of “unserved”, where at least 90 percent of households lack access to facilities-based, terrestrial broadband service at the minimum broadband transmission speed of 768 kbps downstream and 200 kbps upstream, the areas of Union County where we serve is NOT “unserved”, as Satellite Broadband ARRA Application LLC as indicated.
Submitter: BEK Communications Cooperative

Comment: Satellite Broadband ARRA’s proposed project covers exchanges served by BEK Communications Cooperative. BEK currently serves all its exchanges by an existing fiber network that extends from our corporate headquarters in Steele, ND. In this public notice response BEK is providing; 1) a map of the overlapping area where BEK provides broadband services, 2) BEK’s DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from BEK within its service territory, 4) the number of residential households and business establishments subscribing to BEK’s broadband service within the proposed service area, 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: Dakota Central Telecommunications

Comment: Dakota Central Telecommunications demonstrates that it provides broadband service throughout Kidder County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 95% of households in Dakota Central’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 Dakota Central; 95% of the households in Dakota Central’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; Dakota Central 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: Jagwireless

Comment: To Whom It May Concern: Hello, my name is Danny Olsen and I am writing this on behalf of my employer, jagWIRELESS. jagWIRELESS specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrums 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 50 tower sites. In the areas we provide service we often compete with wire-line 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 that Satellite Broadband ARRA Application LLC has requested funds to build a network in Cass County, NE. from the Broadband stimulus program. I wish to submit a dispute regarding the “underserved” designation of this area by Satellite Broadband ARRA Application LLC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both or organization to provide quality services. The areas which Satellite Broadband ARRA Application LLC intends to provide service already have 2 or more local providers and can also receive mobile broadband services from various national mobile providers. This area does not need additional broadband competition as it is well served by private organizations who have invested private dollars to services the broadband needs of the area residents. Underserved Criteria – Advertised Speeds Our wire-line competitor offers speeds of 6 Mbps in each of these service areas and Logangent offers speeds of 3 Mbps in each of the service areas. Attached is an advertisement showing that we do advertise these speeds which AlphaStar would like to service. Penetration Rate Our organization does regular marketing by multiple methods and we occasionally trade customers with the DSL carrier but we are most after the new residents to the area who are newly choosing between multiple carriers. Our organization has been offering services in this market for 7 years. Based on our marketing and survey’s we find that market penetration between our services and those competing with us is well into the 60% range. The remaining 40% of households simply do not want or cannot afford any of the competing service providers, who offer services as low as $25/mo.

-----Service Area: ND_GrandForks

Submitter: MLGC LLC
Comment: MLGC currently provides broadband service via cable modem, with advertised speeds up to 3 Mbps, within the Applicant’s proposed service area. According to MLGC’s analysis of information it has as the incumbent service provider, 100 percent of the residential households in its drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. MLGC’s subscriber penetration rate for broadband service is over 31 percent for the cable service area drawn. Thus, MLGC satisfies two of the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because MLGC already meets these criteria, Applicant has erroneously claimed that the proposed service area is “underserved”. In addition to MLGC’s wireline services, MLGC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant’s proposed service area, with speeds of up to 2 Mbps.

The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution (“LTE”). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun. Verizon’s LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

Thus, MLGC already provides broadband services to the portions of Applicant’s proposed service area, and participates in the provision of mobile broadband services in that area as well.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Broadband Satellite Grand Forks 5 for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: KS_Doniphan

Submitter: NPG Cable, Inc.

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition
NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

**Submitter:** Rainbow Communications

**Comment:** Rainbow Telecommunications Association, Inc. dba Rainbow Communications is a phone, Internet, and cable TV service provider in rural northeast Kansas. The telecommunications company is headquartered in Everest, Kansas, and has been in existence since 1952. While Rainbow Telecommunications has offered high speed DSL-Internet for many years, the company has since expanded its service offerings in 2006 through a CLEC operation, Carson Communications dba Rainbow Communications. Rainbow Communications is able to provide high speed DSL, cable modem, and fiber-based Internet in many northeast Kansas rural communities. It is our goal to provide communication technology which rivals or surpasses those available in metro areas.

-----Service Area: NE_Garden

**Submitter:** Inventive Wireless of Nebraska, LLC dba Vistabeam

**Comment:** Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

**Submitter:** Dalton Telephone Company

**Comment:** Dalton Telephone Company, Inc. (DTC) has been providing high-quality communications services to the residents of the rural communities and Villages of Dalton, Gurley, Lodgepole, Dix, Potter and Bushnell, Nebraska for 92 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Currently, 99% of DTC’s service areas have broadband capability. Because of DTC’s advanced network it can meet the local geographical challenges providing important community anchor institutions including local government and public safety agencies with broadband services. This local presence also allows DTC to provide 24-7 customer service and support. Due to DTC’s entrepreneurial spirit and its dedication to its customers and through a substantial investment in advanced network facilities, the rural communities and surrounding areas of Dalton, Gurley, Lodgepole, Dix, Potter, and Bushnell, Nebraska enjoy the same level of service as offered in metropolitan areas.
Submitter: Consolidated Companies

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA. One hundred percent of the customers to which Consolidated provides landline telephone service within the PFSA are broadband capable.

As the applicant’s proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of unserved, that 90 percent of households in the PFSA lack access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be unserved by the applicant’s definition. This application should be rejected.

-----Service Area: MN_Cass

Submitter: Consolidated Telephone Company

Comment: Consolidated Telephone Company offers ADSL broadband technology with speeds up to 1.5M and ADSL2+ technology with speeds up to 10M and has a 48% average penetration of High Speed Internet to land line telephone customers in our service area.

Submitter: Tekstar Communications, dba ACS

Comment: Tekstar Communications, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach
and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

Submitter: West Central Telephone Association

Comment: West Central Telephone Association ("WCTA") a small rural operator and Rural Utilities Service Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application LLC ("Satellite BB") application for a portion of the Satellite BB proposed funded service area that falls within the boundaries of the WCTA telephone exchanges. Since incorporating in October of 1950, WCTA serving area has included portions of Becker, Cass, Hubbard, Ottertail, Todd and Wadena Counties ("service territories") with the majority of their service area in Wadena County.

Submitter: Johnson Telephone Company

Comment: Satellite Broadband ARRA Application LLC's proposed project covers 100% of the exchanges served by Johnson Telephone Company, which includes Remer, Boy River and Federal Dam, MN. We currently serve the exchange areas by an existing copper ADSL2+ / fiber-to-the-home network. In the public notice response Johnson Telephone Company is providing; 1) a map of the overlapping area Johnson provides broadband services, 2) Johnson'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.

-----Service Area: ND_Ransom

Submitter: Moore and Liberty, Griggs County Telephone

Comment: MLGC currently provides broadband service via DSL, with advertised speeds up to 3 Mbps, within the Applicant’s proposed service area. According to MLGC’s analysis of information it has as the incumbent service provider, 100 percent of the residential households in its drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. MLGC’s subscriber penetration rate for broadband service is over 28 percent for the DSL service area drawn. Thus, MLGC satisfies two of the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because MLGC already meets these criteria, Applicant has erroneously claimed that the proposed service area is “underserved” or “unserved”. In addition to MLGC’s wireline
services, MLGC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant’s proposed service area, with speeds of up to 2 Mbps.

The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution (“LTE”). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun. Verizon’s LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

Thus, MLGC already provides broadband services to the portions of Applicant’s proposed service area, and participates in the provision of mobile broadband services in that area as well.

MLGC continues to push DSL out further into its exchanges and is working on a FTTH plan for all of its areas bring broadband to all subscribers who want to subscribe.

Submitter: Dickey Rural Networks

Comment: Dickey Rural Networks demonstrates that it provides broadband service throughout Ransom County, which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural’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 Dickey Rural; 100% of the households in Dickey Rural’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; Dickey Rural 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: Red River Rural Telephone

Comment: Red River Rural Telephone demonstrates that it provides broadband service within Ransom County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not underserved or underserved.
As demonstrated, over 50% of households in Red River’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 Red River; over 50% of the households in Red River’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 Red River advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area.

-----Service Area:  ID_Lewis

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. 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 which establishes that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area.

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.
-----Service Area:  CO_Alamosa

Submitter:  Stelera Wireless, LLC

Comment:  The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to Alamosa with peak speeds of 9-10 mbps in the next 6 months. The town of Alamosa will be served by Stelera Broadband a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

-----Service Area:  ID_Valley

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

-----Service Area: IA_Pottawattamie

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 least 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 Communications

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: 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: Breda Telephone Corp. dba Western Iowa Networks

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Macedonia, IA exchange served by Breda Telephone Corp. 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. In the public notice response Breda Telephone Corp. (Breda) is providing; 1) a map of the overlapping area Breda provides broadband services, 2) Breda'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.

Service Area: NE_Kimball

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other
broadband providers.  Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

Submitter:  Dalton Telephone Company

Comment:  Dalton Telephone Company, Inc. (DTC) has been providing high-quality communications services to the residents of the rural communities and Villages of Dalton, Gurley, Lodgepole, Dix, Potter and Bushnell, Nebraska for 92 years.  It was one of the first providers in this remote area to offer broadband services seven years ago.  Currently, 99% of DTC’s service areas have broadband capability.  Because of DTC’s advanced network it can meet the local geographical challenges providing important community anchor institutions including local government and public safety agencies with broadband services.  This local presence also allows DTC to provide 24-7 customer service and support.  Due to DTC’s entrepreneurial spirit and its dedication to its customers and through a substantial investment in advanced network facilities, the rural communities and surrounding areas of Dalton, Gurley, Lodgepole, Dix, Potter, and Bushnell, Nebraska enjoy the same level of service as offered in metropolitan areas.

-----Service Area:  OK_Noble

Submitter:  Pioneer Telephone Cooperative

Comment:  Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years.  The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service.

-----Service Area:  TX_Milam

Submitter:  Texas Communications

Comment:  Texas Communications provides high-Speed wireless Internet to the following counties in central Texas:  Brazos, Robertson, Grimes, Burleson and Milam.  The PNF in question would provide government funding to directly compete against our privately funded enterprise and increase competition in an already crowded marketplace.
Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our
average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  SD_Meade

Submitter:  West River Telephone Cooperative Company

Comment:  West River Telephone Cooperative Company demonstrates that it provides broadband service to a portion of Meade County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in West River’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 West River; 100% of the households in West River’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.

-----Service Area:  CO_Conejos
Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Comment: As the NTIA begins their process of reviewing and awarding grants, it is important that they take into consideration the capabilities of the existing providers like BTC. BTC fully supports helping to fund truly un-served or under-served areas. However, many of the applications propose to overbuild existing facilities which results in an unnecessary duplication of service. This may be the case for BTC should some of these grants be approved in our service territory.

The Blanca Telephone Company, BTC, a family owned telephone company, has been providing telephone service to the North Costilla County and Eastern Alamosa County since 1922. The Blanca Telephone Company has a local office and hires local people. The staff has grown from 1 to over 13 individuals. BTC has always had the mindset that the members of the counties and communities it serves need advanced services much more than the people in the city, because rural Americas must
travel miles and miles to the nearest information source, while those in the city can walk across the street.

The BTC also furnishes high speed EVDO wireless in Costilla and Conejos Counties. The EVDO system offers 3 Mbps down and 1 Mbps up.

This appears to be a duplicate facility and is not necessary.

-----Service Area: IA_Wayne

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: WA_Benton

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline
and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

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.

-----Service Area: NM_Curry

Submitter: Yucca Telecommunications, Inc.

Comment: Yucca Telecommunications provides data services utilizing DSL and Fiber-to-the-Premise technology within the proposed funded service area in Curry County. Yucca's services are provided in the communities of Melrose and Texico, New Mexico, and surrounding areas within the telephone Exchanges of Melrose and Texico. Yucca offers a "High Speed" service with up to 6 Mbps/2 Mbps (down/up) and various other data plans. Yucca is a wholly owned subsidiary of Roosevelt County Rural Telephone Cooperative, which is the incumbent telecommunications provider for the Texico and Melrose exchanges and a current RUS borrower.

Submitter: ENMR Telephone Cooperative, Inc.

Comment: ENMR currently serves most of Curry County with DSL as part of its telephone service area.

Submitter: Plateau

Comment: Plateau currently serves areas in Curry County with both a licensed fixed wireless service and a fiber to the premise service.
-----Service Area: NE_Adams

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

Submitter: Glenwood Telephone Membership Corporation

Comment: Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

-----Service Area: TX_Donley

Submitter: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Clarendon, Lelia Lake, Howardwick and Hedley, Texas for which funds are being requested in this application, we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

-----Service Area: MT_Sanders

Submitter: Hot Springs Telephone Company

Comment: Hot Springs Telephone Company demonstrates that it provides broadband service to portions of Sanders County which is encompassed in the proposed funded Service Area in the Satellite
Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households within Hot Springs in Hot Springs’ service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with a speed of greater than 768 kbps downstream and 200 kbps upstream from Hot Springs; 100% of the households within 3 miles of Hot Springs in Hot Springs’ 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.

-----Service Area: NE_Cheyenne

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

Submitter: Dalton Telephone Company

Comment: Dalton Telephone Company, Inc. (DTC) has been providing high-quality communications services to the residents of the rural communities and Villages of Dalton, Gurley, Lodgepole, Dix, Potter and Bushnell, Nebraska for 92 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Currently, 99% of DTC’s service areas have broadband capability. Because of DTC’s advanced network it can meet the local geographical challenges providing important community anchor institutions including local government and public safety agencies with broadband services. This local presence also allows DTC to provide 24-7 customer service and support. Due to DTC’s entrepreneurial spirit and its dedication to its customers and through a substantial investment in advanced network facilities, the rural communities and surrounding areas of Dalton, Gurley, Lodgepole, Dix, Potter, and Bushnell, Nebraska enjoy the same level of service as offered in metropolitan areas.
Submitter: Hamilton.net, Inc.

Comment: Hamilton.net has been offering broadband services using 5200 MHz and 5700 MHz unlicensed wireless equipment in this area for several years.

-----Service Area: NV_Clark

Submitter: Moapa Valley Telephone

Comment: Applicant is applying for funds for an area that is neither unservered or underserved. This application should be denied.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

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 least ten years. Cox provides its customers in Nevada 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: Baja Broadband Operating Company, LLC

Comment: Baja Broadband provides cable modem service in Mesquite at speeds up to 6Mbps. Mesquite also is served by Reliance Connects DSL service.

-----Service Area: NE_Nance

Submitter: Clarks Telecommunications Company

Comment: Clarks Telecommunications Company (CTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps CTC’s service area.

CTC was organized in 1908 and in 2007 was acquired by Northeast Nebraska Telephone Company (NNTC), a customer owned cooperative.

CTC is presently a borrower with the Rural Utilities Service and has been since 1957.

Within the PFSA overlap, CTC’s recently constructed buried fiber optics cable to the premise (FTTP) network provides access to Broadband services to 100% of the residential households and businesses, CTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and with this new buried FTTP network CTC anticipates the rate of subscription to be greater than 40% in a relatively short period of time.
Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTP Broadband capable network, and divert funding that could be available for unserved areas.

Submitter: Hamilton.net, Inc.

Comment: Hamilton.net has been offering broadband services using 5700 MHz and 900 MHz unlicensed wireless equipment in this area for several years. Additionally, Hamilton.net just began offering stationary unmetered broadband services using 3G 1XEVDO/Rev A in the southern portion of this area. Our brand name for this service is "GMAX". This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service.

-----Service Area: TX_Lampasas

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our
data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in Lampasas County, TX, an area covered by Satellite Broadband’s Lampasas County broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 82.7% of its potential households. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. Central Texas’ provision and advertising of broadband service, coupled with
the combined penetration rate of all broadband providers, should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

-----Service Area:  KS_NeoSho

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.

-----Service Area: ND_McIntosh

Submitter: BEK Communications Cooperative

Comment: Satellite Broadband ARRA’s proposed project covers exchanges served by BEK Communications Cooperative. BEK currently serves all its exchanges by an existing fiber network that extends from our corporate headquarters in Steele, ND. In this public notice response BEK is providing; 1) a map of the overlapping area where BEK provides broadband services, 2) BEK’s DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from BEK within its service territory, 4) the number of residential households and business establishments subscribing to BEK’s broadband service within the proposed service area, 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: Dickey Rural Networks

Comment: Dickey Rural Networks demonstrates that it provides broadband service throughout McIntosh County, which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural’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 Dickey Rural; 100% of the households in Dickey Rural’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; Dickey Rural 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.

-----Service Area:  IA_Cass

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:  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 Satellite Broadband ARRA Application LLC 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: Nucla-Naturita Telephone Co.

Comment: Nucla-Naturita Telephone Company, d.b.a. NNTC Wireless, has been providing high-quality communication services to the remote and mountainous areas of western Colorado for more than sixty years. We were among the first in the area to provide broadband service. In 2003, NNTC’s customers could access the Internet at 640 kbps, a speed at the time that rivaled metropolitan areas.

NNTC continually stays atop off technological trends offering its customers ever-increasing speeds. In 2006, customers were offered broadband service at speeds topping out at 3 Mbps.

NNTC operates in the Rocky Mountains and provides service to community anchor institutions including forest service offices and wildfire stations. Due to the extreme terrain, some remote areas were unable to receive broadband services over wireline facilities. In order to serve these residents and institutions, NNTC invested in wireless spectrum in 2005. Customers can now access wireless broadband services including 3G EVDO wireless access. NNTC is a local company, proudly serving the western slopes of the Rocky Mountains. It looks forward to the next 60 years, keeping this geographically remote area on the technological cutting edge.
-----Service Area: UT_Juab

Submitter: Wirelessbeehive.com

Comment: Wirelessbeehive.com is currently providing DSL service in Juab County.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, UT Juab for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: OK_Oklahoma

Submitter: Cox Communications

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 least ten years. Cox provides its customers in Oklahoma 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.

-----Service Area:  SD_Pennington

Submitter:  HANSON COMMUNICATIONS

Comment:  Mt. Rushmore/Ft. Randall Telephone Company ("Company"), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the community of Keystone and areas North of Hermosa, SD and covers a portion of the proposed funded service area ("Area") since 1996 after purchasing it from Qwest Communications. In 2004, the Company began providing broadband service to the communities and the surrounding area.
We disagree with the Applicant’s assertion that the area is either unserved or underserved. At no time did the Applicant contact us to determine the status of the area regarding broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company provides broadband service to 90% of our end users in this area and of those 100% all are above the NOFA defined broadband speeds for unserved areas.

-----Service Area:  WA_WallaWalla

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 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.

-----Service Area:  TX_Presidio

Submitter:  Big Bend Telephone Co.

Comment:  Big Bend Telephone Comapany, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----Service Area:  SD_Buffalo
Submitter: Midstate Communications, Inc.

Comment: We serve this area and offer 3 mg service.

-----Service Area: IA_Guthrie

Submitter: Prairie Telephone Co., Inc dba Western Iowa Networks

Comment: Satellite Broadband ARRA Application LLC’s proposed project covers the Yale, IA exchange served by Prairie Telephone Co., Inc dba Western Iowa Networks. 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. In the public notice response Prairie Telephone Co., Inc dba Western Iowa Networks (Prairie) is providing; 1) a map of the overlapping area Prairie provides broadband services, 2) Prairie'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: 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: 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: 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: 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).

-----Service Area: MN_Traverse

Submitter: Runestone Telephone Association

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Tintah exchange in Traverse County that is currently served by Runestone Telephone Association. We currently serve the exchange by an existing fiber-to-the-home network. In the public notice response Runestone Telephone Association is providing; 1) a map of the overlapping area Runestone provides broadband services, 2) Runestone'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: Federated Telephone Cooperative

Comment: Federated Telephone Cooperative service territory overlaps by less than 1% (based upon households passed) of the Satellite Broadband ARRA Application LLC – MN_Traverse proposed funded service area (PFSA). The penetration for FTC is reasonable in the overlap area. When combined with other providers, the total penetration may be over 40% for the entire PFSA. In addition, FTC provides service to the entire overlap area with service that is advertised at 3 Mbps or above. Federated has built a fiber to the premise network covering all of its exchanges.

Submitter: Valley Telephone Company
**Comment:** The applicant incorrectly claims the area served by our company as unserved. 100% of the establishments in our serving territory have access to facilities-based, terrestrial 3Mb plus internet. The rate of broadband subscribership is 40.5%.

**Submitter:** Red River Rural Telephone

**Comment:** Red River Rural Telephone demonstrates that it provides broadband service within Traverse County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, over 50% of households in Red River’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 Red River; over 50% of the households in Red River’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 Red River advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area.

-----**Service Area:** SD_Brookings

**Submitter:** Interstate Telecommunications Cooperative

**Comment:** Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Brookings County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application.

As demonstrated, 54% of households in ITC’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 ITC; These households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is seven percent of households. RUS monies are committed to complete deployment to the remaining
46% of this service area, bringing broadband deployment to 100%. Minimum services of 1.5Mbps and higher will be provided.

Submitter: Swiftel Communications

Comment: Brookings Municipal Utilities d/b/a Swiftel Communications, a department of the City of Brookings, South Dakota (“Swiftel”), demonstrates herein that it provides broadband service throughout the entire area in which the Swiftel incumbent service area overlaps the Proposed Funded Service Area (“PFSA”) in the application of Satellite Broadband ARRA Application LLC (“Satellite” or “Applicant”), and that this portion of the PFSA is neither “unserved” nor “underserved” pursuant to the applicable definitions. Satellite proposes a bifurcated service area, claiming that the City of Brookings itself is “underserved” and that the adjoining area east of City of Brookings is “unserved”. The relevant portion of the PFSA is not “unserved” because well over 90% of households in such PFSA are able to readily subscribe from Swiftel alone (not to mention Mediacom Communications Corporation (“Mediacom”), an unrelated competing provider of broadband services) upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream. This portion of the PFSA is not “underserved” because: (1) well over 50% of the households in the 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; (2) Swiftel itself (as well as Mediacom) advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the overlapped portion of the Proposed Funded Service Area; and (3) the rate of broadband subscribership for Swiftel and Mediacom in the PFSA is greater than 40 percent of the households therein.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Brookings for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.
Submitter: Clarks Telecommunications Company

Comment: Clarks Telecommunications Company (CTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps CTC’s service area.

CTC was organized in 1908 and in 2007 was acquired by Northeast Nebraska Telephone Company (NNTC), a customer owned cooperative.

CTC is presently a borrower with the Rural Utilities Service and has been since 1957.

Within the PFSA overlap, CTC’s recently constructed buried fiber optics cable to the premise (FTTP) network provides access to Broadband services to 100% of the residential households and businesses, CTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and with this new buried FTTP network CTC anticipates the rate of subscription to be greater than 40% in a relatively short period of time.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTP Broadband capable network, and divert funding that could be available for unserved areas.

Submitter: Hamilton.net, Inc.

Comment: Hamilton continues to offer broadband using 5700 MHz and 900 MHz unlicensed wireless equipment in the same polygon for several years.
Submitter: Consolidated Telcom

Comment: Consolidated Telcom service territory overlaps approximately 72% of the Satellite Broadband Application LLC Bowman proposed funded service area (PFSA). Satellite Broadband Application LLC Bowman designates this area as underserved. In the overlapping area, Consolidated service advertises 20 meg service.

-----Service Area: ID_Bannock

Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 75% overlap of its coverage with the PFSA based on households served.

Submitter: Cable One, Inc.

Comment: Satellite Broadband/Bannock Co./Pocatello - 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: Direct Communications Cable

Comment: Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least to 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain service areas. It appears that Satellite Broadband ARRA’s application overlaps the company’s area of service that includes the communities of Downers, Lava Hot Springs, and McCamon and DCC believes that this area of service is neither unserved or underserved in broadband services.

Service Area: MN_Becker
Submitter: West Central Telephone Association

Comment: West Central Telephone Association ("WCTA") a small rural operator and Rural Utilities Service Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application LLC ("Satellite BB") application for a portion of the Satellite BB proposed funded service area that falls within the boundaries of the WCTA telephone exchanges. Since incorporating in October of 1950, WCTA serving area has included portions of Becker, Cass, Hubbard, Ottertail, Todd and Wadena Counties ("service territories") with the majority of their service area in Wadena County.

-----Service Area: OK_Harper

Submitter: Panhandle Telephone Cooperative, Inc.

Comment: Panhandle Telephone Cooperative, Inc. provides comments on this application regarding the underserved designation of the proposed funded area.

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area: MT_Missoula

Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Bresnan) and DSL (Qwest, Blackfoot and Centric) broadband providers in the PFSA. DBC estimates <5% overlap of its coverage with the large PFSA based on households served.
**Submitter:** Bresnan Communications

**Comment:** Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** OK_Okmulgee
Submitter: Beggs Telephone Company, Inc.

Comment: Beggs Telephone Company has recently upgraded DSL service to the City of Beggs and Town of Winchester and is now offering speeds up to 6 mbps service to these communities and surrounding areas. This includes 100% of all households in the City of Beggs and Town of Winchester and 74% of the 1580 households in our exchange. Currently a construction project to upgrade DSL service to even more of our service area is taking place, which will raise the percentage to 87% of our customers capable of receiving up to 6 mbps service in our service area. Beggs Telephone Company does offer 1.5 mbps to all of our service area. We began offering DSL Service in August 2001.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed
funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: OK_Creek

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 least ten years. Cox provides its customers in Oklahoma 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: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Beggs Telephone Company, Inc.

Comment: Beggs Telephone Company currently serves this service area with DSL speeds up to 1.5 mbps.

Submitter: Cimmaron Telephone Co.
**Comment:** Cimarron Telephone Company through its subsidiary Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Cimarron Telephone Company serves.

-----**Service Area:** TX_Pecos

**Submitter:** Big Bend Telephone Co.

**Comment:** Big Bend Telephone Company, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----**Service Area:** TX_Moore

**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 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:** Stelera Wireless, LLC

**Comment:** The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The proposed service area is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps.
downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area:  KS_Rawlins

Submitter:  Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment:  Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or unserved as defined in the NOFA.

Submitter:  BW Telcom

Comment:  Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, currently provides Broadband service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least 768/200 Kbps. The current penetration rate of Broadband service at a speed of 768/200 Kbps or higher in this application area is not applicable due to no households or businesses in the area BW Telcom advertises and offers a 5 Mbps Broadband service.

-----Service Area:  OK_Garfield

Submitter:  Pioneer Telephone Cooperative

Comment:  Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter:  KanOkla Networks
Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

-----Service Area: ID_Gem

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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: KS_Washington

Submitter: Blue Valley Tele-Communications, Inc.

Comment: Blue Valley Tele-Communications, Inc. (BVTC) is a rural telephone cooperative that has been serving these remote and rural communities for over 50 years. BVTC was one of the first companies in the nation to offer High-Speed DSL to both in-town and rural customers no matter the distance from the central office. BVTC is also building for future applications and higher demands for broadband by investing in a fiber to the premise network that will reach 100% of its customers in their telephone exchanges, and was one of the first companies in the nation to attempt this type of network. On top of these offerings, BVTC offers Internet services via cable modems and wireless technologies to many communities that lie outside of their ILEC telephone exchanges.
As a cooperative, BVTC services are driven by customer need and demand and customers are represented by a Board of Directors to make sure those needs are being met. The company also commits a full-time employee for economic development projects in the communities it serves. BVTC is proud to be known as an industry leader in the broadband arena, and plans to continue leading the way in broadband development in the future.

-----Service Area: NE_Seward

Submitter: Clarks Telecommunications Company

Comment: Clarks Telecommunications Company (CTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps CTC’s service area.

CTC was organized in 1908 and in 2007 was acquired by Northeast Nebraska Telephone Company (NNTC), a customer owned cooperative.

CTC is presently a borrower with the Rural Utilities Service and has been since 1957.

Within the PFSA overlap, CTC’s recently constructed buried fiber optics cable to the premise (FTTP) network provides access to Broadband services to 100% of the residential households and businesses, CTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and with this new buried FTTP network CTC anticipates the rate of subscription to be greater than 40% in a relatively short period of time.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTP Broadband capable network, and divert funding that could be available for unserved areas.
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.”

-----Service Area: OK_Beckham

Submitter: Dobson Telephone Company

Comment: Dobson Telephone Company challenges the application of Satellite Broadband ARRA Application LLC based on their declaration of the serving area being underserved.

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: Dobson Telephone company

Comment: This is our service area.

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.
Comment: Pioneer Communications, a wireline telecommunications provider serving 10 counties in western Kansas, has connected rural communities for more than five decades, and today delivers telephone, cable television and high-speed Internet service. Pioneer first became an Internet Service Provider (ISP) in 1995 by introducing educational Internet networking services for the schools located in its service area, and soon thereafter, made Internet access available commercially to Pioneer's telephone customers. Currently, Pioneer provides broadband internet access to 100% of its wireline service area using both Digital Subscriber Line (DSL) over its telephony infrastructure, and data over cable modems via its cable television system.

The applicant’s Proposed Service Area covers Stanton County, all of which falls within Pioneer Communications’ service area. Pioneer offers broadband not only to those customers living within towns, but also to those residing in the far reaches of the county. The referenced application states that there are 858 households and 141 business located in the Proposed Service Area. Pioneer’s rate of broadband subscribership for the proposed service area is over 40% percent of households.

Pioneer consistently and effectively advertises the availability of its broadband internet access throughout the Stanton County area. For example, advertisements for Pioneer’s broadband internet access service can be found in the local newspaper, on television, on billing inserts and on the radio. Pioneer also frequently advertises by providing sponsorship to area high school events and other community activities. The attached document is an example of ads that were distributed within the Proposed Service Area.

In conclusion, Pioneer Communications contends that the referenced application incorrectly characterizes Stanton County as underserved. Pioneer asserts that Stanton County is well-served by broadband internet access and the above referenced application does not meet the conditions of “underserved” as set forth in the NOFA.

Submitter: United Telephone Assn
Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s wireless EVDO RevA network supports wireless broadband at speeds up to 3.1 Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy.

-----Service Area: TX_Haskell

Submitter: KeyOn Communications

Comment:

KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: TX_Terrell
Submitter: Big Bend Telephone Co.

Comment: Big Bend Telephone Company, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----Service Area: TX_King

Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: King County Texas is being labeled as an Unserved rural area. We challenge the position regarding King County Texas considered as an unserved location.

As the Incumbent Local Exchange Carrier in this rural area (see map) we provide landline and broadband service offerings throughout King County Texas including the community of Guthrie. It should be noted the rural areas are sparsely populated and providing these services is challenging. The community of Guthrie, Texas is the lone populated community in King County Texas. This community has satellite broadband service providers available to all residents and business in addition to Cap Rock services. Cap Rock Telephone Cooperative, Inc. has and will continue to invest in providing services to customers in rural Texas including King County Texas. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: IA_Plymouth

Submitter: Evertek, Inc
Comment: Evertek 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: 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: WesTel Systems

Comment: WesTel Systems demonstrates that it provides broadband service throughout the Remsen area which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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.

-----Service Area: OK_Delaware

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to
the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Grand Telephone Co. Inc

Comment: The area in which the applicant Satellite Broadband ARRA Application LLC has filed a stimulus application defining an underserved area, a portion of Satellite Broadband ARRA Application LLC application area is currently served with Broadband by Grand Telephone. Over the last seven years Grand Telephone has made and maintained significant investments to provide 768 kbps broadband speeds to all establishments in its serving area. Grand Telephone advertises the availability of 3 Mb Broadband Speeds to all establishments within its Jay and Disney exchanges.

Submitter: Salina Spavinaw Telephone Company, Inc.

Comment: The area that Salina Spavinaw Telephone Company, Inc. serves is neither underserved or unserved. We have purchased new equipment since June 30, 2009 that will enable our company to serve at least 90% of households in this service area. The service will be downloads of at least 768K and up to 3.0Mbps.

Submitter: Seneca Goodman and Ozark Telephone Companies

Comment: Seneca, Goodman, and Ozark Telephone Companies, an RUS/RDUP telecom loan program borrower, currently provides broadband internet service access to all establishments located within their certificated service areas. The lowest advertised broadband internet service package is 1 Mb downstream with 3 Mb internet service also being advertised. I.P. Video services are available throughout all exchange areas, further demonstrating and utilizing the capacity of the established broadband facilities. The Seneca Goodman and Ozark Telephone Companies have provided dedicated fiber access for broadband service transmission to schools located within their exchange areas, and in 2004 began providing broadband internet access in their certificated exchange areas of rural southwest Missouri, Northwest Arkansas, and Northeast Oklahoma. Currently several fixed broadband facility and nationwide wireless providers are competing for broadband services within the exchange areas of Seneca, Goodman, and Ozark Telephone Companies.
Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: MT_Blaine

Submitter: Triangle Telephone Cooperative

Comment: Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of unserved nor underserved under the ARRA. Triangle Telephone offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Triangle Telephone.

Submitter: Central Montana Communications

Comment: Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.
Submitter: The Tri-County Telephone Association, Inc.

Comment: The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter: Moundridge Telephone Company

Comment: For the portion of this application that overlaps the Moundridge Telephone Company serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Moundridge Telephone offers a 4Mbps downstream / 1 Mbps upstream service in this area. Lastly, Moundridge Telephone supplies broadband service to over
50% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

**Submitter:** TC Wireless

**Comment:** TC Wireless, Inc, along with its parent company The Tri-County Telephone Association, Inc., has been providing communications services to rural Kansas for over 46 years. TC Wireless was formed in 2004 specifically to provide wireless broadband services to communities that larger companies ignored. TC Wireless is a pioneer in providing high-quality services over the 700 Mhz wireless spectrum. It acquired its licenses at auction in 2002, taking a chance on the unproven spectrum. It began providing services in this band as soon as equipment was available. To meet the specific needs of the communities it serves, TC Wireless has expanded its offerings to include the 900 MHz and 2.4 MHz bands.

By utilizing an array of licensed and unlicensed spectrum, TC Wireless achieved a task five years ago that some still say today is not possible – bringing high speed Internet access to rural and remote areas. It did this, at considerable cost, because, as a local company, TC Wireless’ owners, who are also its customers, have a personal stake in the communities where they work and live. As a result, TC Wireless is providing rural America with advanced, reliable communications service.

**Submitter:** KeyOn Communications

**Comment:** KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

**Service Area:** ID_Clearwater

**Submitter:** Suddenlink Communications

**Comment:** This application, filed by a satellite provider of broadband services, proposes a multi-state funded service area (FSA), within which Suddenlink provides wireline broadband services. The sizable number of responses that Suddenlink needed to file as part of this overall process, and the 30-day window in which we were allowed to do so, prohibited us from mapping all Suddenlink-served areas
within this particular, multi-state FSA. Accordingly, for the purposes of our response to this application, we have mapped one Suddenlink service area as an example of the company’s many service areas within the applicant’s proposed FSA. Suddenlink requests that the agency reviewing this response take special care to determine ALL of the served areas in the applicant’s FSA and restrict any awarded funds to the provision of broadband service in the unserved and underserved portions of the proposed FSA.

Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the “Existing Broadband Subscribers” section of this response; (3) a summary of the vendor and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.

-----Service Area: CO_Custer

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Beulahland Communications, Inc.

Comment: Beulahland Communications, Inc. provides broadband services at speeds greater than 768 KB to all customers requesting service in the SE corner of Custer County, CO along State Highway 165 from the Pueblo County Line to Fairview as shown on map submitted.

Submitter: Rye Telephone Company

Comment: Rye Telephone Company (RTC) has been providing high-quality communications services in the remote and rural communities of Rye, Colorado City and Kim, Colorado for 50 years. RTC has been offering broadband services since 2002 and can offer speeds up to 5 Mbps within its service areas.

In keeping with its long tradition of providing cutting-edge technologies, RTC utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. At considerable investment, RTC deployed a Fiber-to-the-Premise (FTTP) platform to serve the vast majority of its service areas.

RTC is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Because of RTC’s advanced network, important community anchor institutions including local and state government, public safety agencies, healthcare facilities, schools and libraries now have broadband services. Due to RTC’s entrepreneurial spirit, its dedication to its customers and through a substantial investment in advanced network facilities, these rural southern Colorado communities enjoy the same level of service as offered in metropolitan areas.

-----Service Area: NE_Knox
Submitter: Three River Telco

Comment: Three River Telco currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a “Served” area. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 40% of households. Three River Telco offers an 8 Mbps service

-----Service Area: MT_PowderRiver

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 52% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Satellite Broadband ARRA Application LLC’s application for broadband funds support in Powder River County Montana, their comments that the areas are unserved or underserved are not true. We serve the majority of Powder River County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.
Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA Application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Powder River County. Range has 4 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area:  NE_Dawson

Submitter:  ATC Communications

Comment:  Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATC is capable of offering broadband service to all the households in its service territory.

Submitter:  Consolidated Companies Inc.

Comment:  Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.
Consolidated is aware of the provision of broadband within other areas of the applicant’s proposed PFSA by Qwest, KDSI, Internet Nebraska, Allo, ATC JetNet, McCookNet, Frontier Communications, Charter Cable and Verizon Wireless. (Entry of a selected zip code from the Applicant’s proposed PFSA into the Verizon Wireless coverage locator at www.verizonwireless.com gives a result which indicates that Verizon’s Mobile Broadband product is currently available within the PFSA.) The addition of another service provider in an area that is already served by such a number of broadband providers would make it difficult have an economically viable business model.

The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA.

As the applicant’s proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of unserved, that 90 percent of households in the PFSA lack access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be unserved by the applicant’s definition, (which Consolidated disputes). The same would be the case for the portion of the PFSA for which the applicant claims underserved. This application should be rejected.

Submitter:  ATCjet.net LLC

Comment:  ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter:  Cozad Telephone Company

Comment:  Cozad Telephone Company (CTC) provides wireline and wireless high speed broadband internet service at 3 Mbps downstream and 1 Mbps upstream. CTC is capable of delivering broadband internet to 100% of the households in its service territory.
-----Service Area: TX_Crosby

Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: Crosby County Texas is being labeled as an Underserved rural area. We challenge the position regarding Crosby County Texas rural population as an underserved location.

As the Incumbent Local Exchange Carrier in the Southeastern corner of this rural area (see map) we provide landline and broadband service offerings throughout rural areas in Crosby County Texas. It should be noted the rural areas are sparsely populated and providing these services is not without challenge. Cap Rock Telephone Cooperative, Inc. will continue to invest in providing services to customers in rural Texas including Crosby County Texas.

Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Crosby county rural area. Satellite service providers are available to a number of residential and smaller numbers of businesses in rural Crosby County Texas. Competition exists with limited potential customers. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: WA_Wahkiakum

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.
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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has
proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

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: Wahkiakum West Television Inc., dba Wahkiakum West

Comment: The Applicant has applied for funds to serve an area that is neither “unserved” nor “underserved.”

Wahkiakum West Television, Inc., dba Wahkiakum West Internet, for and on behalf of itself and its affiliate, Western Wahkiakum County Telephone Company, (collectively, the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Wahkiakum County, Washington (“Wahkiakum County”). The Company’s broadband service area includes a portion of Wahkiakum County. Although the Application depicts and describes the portion of Wahkiakum County that is encompassed by the Company’s broadband service area as either “unserved” or “underserved,” that proposed funded service area is neither “unserved” nor “underserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Wahkiakum County.
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: Citizens Telecommunications Company of Idaho

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

-----Service Area: SD_Roberts

Submitter: RC Technologies

Comment: As illustrated on the map below, the proposed funded service area of the applicant, Satellite Broadband ARRA Application LLC, proposes to serve an area (Roberts) currently served by RC Technologies (RCT). Within the 497 square mile area of overlap, RCT has the capability to provide broadband service via DSL with speeds of up to 1.5 Mbps down and 768 Kbps up to 100% of households and businesses.

Submitter: Venture Communications Cooperative

Comment: Venture Communications Cooperative demonstrates that it provides broadband service throughout Roberts County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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: Valley Telephone Company

Comment: The applicant incorrectly claims the area served by our company as unserved. 100% of the establishments in our serving territory have access to facilities-based, terrestrial 3Mb plus internet. The rate of broadband subscribership is 48.7%. Moreover, the area is served by 1 other provider utilizing licensed wireless spectrum. This does not include cellular or satellite offerings.

Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Moody County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application.

As demonstrated, 100% of households in ITC’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 ITC; 100% of the households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

-----Service Area: TX_Foard
**Submitter:** KeyOn Communications

**Comment:** KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

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**Service Area:** MN_Kanabec

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**Submitter:** US Cable of Coastal-Texas, L.P.

**Comment:** US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

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**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

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**Service Area:** MT_Richland

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**Submitter:** Reservation Telephone Cooperative

**Comment:** The applicant contends the Proposed Funded Service Area (Richland County), which overlays an RTC service area, is underserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is underserved and has concluded it is not. According to RTC’s analysis, 100 percent of the residential households in the service area have access to broadband service, as defined in the NOFA, and are capable of being served. Of those households capable of being served, the broadband service
penetration rate is 66 percent. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps throughout the service area, including in the area newspapers and magazines, direct mail and area radio stations.

Submitter: Mid-Rivers Communications

Comment: As indicated on our response map, the vast majority of Richland County is NOT UNSERVED OR UNDERSERVED as the Applicant has stated. Mid-Rivers Communications currently provides and advertises broadband of up to 10 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Sidney, Fairview, and Lambert; 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Savage; 3 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in West Sidney; and broadband meeting or exceeding the NOFA definition in other rural areas indicated on the map. Mid-Rivers is the Incumbent Local Exchange Carrier in much of this area, and recently built out Fiber to the Premise (FTTP) service to the majority of the Lambert exchange (which is shown as UNSERVED on the Applicant's map) utilizing Rural Utilities Service (RUS) loan funding. Additional RUS funding from the recently approved loan will be used to build FTTP to other unserved customers in Mid-Rivers' incumbent service area in Richland County.

-----Service Area: TX_Fannin

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: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested
funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----Service Area: NM_Torrance

Submitter: ENMR Telephone Cooperative, Inc.

Comment: ENMR currently serves the eastern side of Torrance County with DSL as part of its telephone service area.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Torrance for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NE_Cherry

Submitter: Consolidated Companies Inc

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for
broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant’s PFSA claims 693 households unserved of which 270 households or 39 percent of the unserved households have access to broadband from Consolidated. Consolidated is aware of five other broadband service providers (Internet Nebraska, Cable Nebraska, Three rivers Telco, Qwest, and Verizon) within the applicant’s PFSA. (Entry of a selected zip code from the Applicant’s proposed PFSA into the Verizon Wireless coverage locator at www.verizonwireless.com gives a result which indicates that Verizon’s Mobile Broadband product is currently already available within the PFSA.)

The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of unserved, that 90 percent of households in the PFSA lack access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be unserved by the applicants definition, (which Consolidated disputes). This application should be rejected.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Cherry for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.
-----Service Area:  KS_Norton

**Submitter:** Rural Telephone Service Co., Inc./Nex-Tech, Inc.

**Comment:** Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

-----Service Area:  SD_Walworth

**Submitter:** Venture Communications Cooperative

**Comment:** Venture Communications Cooperative demonstrates that it provides broadband service throughout Walworth County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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:** Valley Telecommunications Coop

**Comment:** Valley Telecommunications Cooperative (Valley) 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. Valley is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. In the area of overlap, greater than 50% of households have access to facilities-based broadband service and the rate of broadband subscribership for residential households and business
establishments exceeds 40%. Valley also advertises broadband transmission speeds of at least 3 Mbps downstream within the area of overlap.

-----Service Area: OK_Garvin

Submitter: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several
years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Chickasaw Telephone Company

Comment: Chickasaw Telephone Company has been offering broadband speed data service to subscribers through its subsidiary Bright Net Oklahoma for 11 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary, is served with high speed internet broadband service.

-----Service Area: CO_Fremont

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband
CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_McCulloch

Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in McCulloch County, TX, an area covered by Satellite Broadband’s McCulloch County
broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 15% of its potential subscribers. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. Central Texas’ provision and advertising of broadband service, coupled with the combined penetration rate of all broadband providers, should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.

-----Service Area:  KS_Barber

Submitter:  Haviland Telephone Co., Inc.

Comment:  Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Barber County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes the towns of Isabel and adjacent rural areas, and rural areas of the telephone exchange areas of Nashville, Sawyer, and Coats.

Submitter:  South Central Telephone Association, SCTelcom

Comment:  SCTA, established in 1953, is submitting a response to dispute service availability for a portion of the applicant’s area. We would like to establish the fact that we are providing broadband access exceeding the 768 Kbps minimum as defined by the NOFA. We have been advertising High speed Broadband service of 1.5, 3, and 6Mbps in our response area.

Submitter:  KanOkla Networks

Comment:  KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.
Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Comment: Eastern Slope Rural Telephone Association, Inc. (ESRTA) has been providing high-quality communications services to rural eastern Colorado for 57 years. Based on our history of serving difficult-to-serve areas that larger providers ignore, ESRTA is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work. To this end, ESRTA is capable of providing broadband services at speeds exceeding 5 Mbps download.

ERSTA is a local company that provides much-needed jobs, 24-7 customer service and local offices. ERSTA is proud to count among its broadband customers community anchor institutions including
schools, hospitals, local government offices and public safety agencies. It serves from a local perspective because ERSTA’s owners, who are also its customers, have a personal stake in the communities where they work and live.

-----Service Area: KS_Edwards

Submitter: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.
Submitter: United Telephone Assn

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s wireless EVDO RevA network supports wireless broadband at speeds up to 3.1 Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy.

-----Service Area: NE_Valley

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 580 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K
upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

Submitter: Hamilton.net, Inc.

Comment: Hamilton.net just began offering stationary unmetered broadband services using 3G 1xEVDO/Rev A in this location. Our brand name for this service is "GMAX". This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service.

-----Service Area: OK_Caddo

Submitter: Carnegie Telephone Company

Comment: Carnegie Telephone Company provides DSL to 100% of the Carnegie and Alfalfa exchanges at speeds of at least 3mbps. The subscribership of the areas is greater that 40% of households.

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.
Submitter: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: MT_Prairie

Submitter: Mid-Rivers Communications

Comment: As indicated on our response map, much of Prairie County, Montana, including the communities of Terry and Fallon, are NOT UNDERSERVED as the Applicant has stated. Mid-Rivers Communications, the Incumbent Local Exchange provider throughout this area, currently provides and advertises broadband of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Terry; 3 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Fallon; and broadband meeting or exceeding the NOFA definition to other surrounding rural areas indicated on the map. We have also recently been approved for a Rural Utilities Service (RUS) loan for future construction of Fiber to the Premise (FTTP) services in these Exchanges.

-----Service Area: TX_Parker

Submitter: CenturyLink
**Comment:** The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: NM_Catron

Submitter: Western New Mexico Telephone Company, Inc.

Comment: Respondent identifies locations within the Applicant’s service area that are not un-served or underserved

-----Service Area: CO_LasAnimas

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our
average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Rye Telephone Company

Comment: Rye Telephone Company (RTC) has been providing high-quality communications services in the remote and rural communities of Rye, Colorado City and Kim, Colorado for 50 years. RTC has been offering broadband services since 2002 and can offer speeds up to 5 Mbps within its service areas.

In keeping with its long tradition of providing cutting-edge technologies, RTC utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. At considerable investment, RTC deployed a Fiber-to-the-Premise (FTTP) platform to serve the vast majority of its service areas.

RTC is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Because of RTC’s advanced network, important community anchor institutions including local and state government, public safety agencies, healthcare facilities, schools and libraries now have broadband services. Due to RTC’s entrepreneurial spirit, its dedication to its customers and through a substantial investment in advanced network facilities, these rural southern Colorado communities enjoy the same level of service as offered in metropolitan areas.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications
found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  WA_Snohomish

Submitter:  Whidbey Telephone Company

Comment:  Whidbey Telephone Company dba Whidbey Telecom, for and on behalf of itself and its affiliate, Hat Island Telephone Company, (collectively, the “Company”), opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include the entirety of Gedney (Hat) Island in Snohomish County, Washington (“Snohomish County”). The Company’s broadband service area includes the entirety of Gedney (Hat) Island. The portion of Snohomish County that is encompassed by the Company’s broadband service area is neither “unserved” nor “underserved,” and the Application does not depict or describe it as either “unserved” or “underserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Snohomish County.

-----Service Area:  OK_RogerMills

Submitter:  Dobson Telephone Company

Comment:  This is our serving area.

Submitter:  Windstream

Comment:  Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency
officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: WA_Kitsap

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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.
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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline
and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Seattle Broadband ARRA Application LLC - Kitsap for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Archer

Submitter: Community Telephone Company/Comcell

Comment: Community Telephone Company provides this reply to the Satellite Broadband Archer City Tower PFSA. Community offers broadband service availability to 95% of the overlapping portion of the PFSA as projected by Satellite. Because it provides such availability, the Community overlap in a portion of the PFSA should not be eligible for the underserved designation.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: AZ_Coconino
Submitter: South Central Utah Telephone Association

Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service in portions of Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant's characterization of its service area as being underserved is entirely without merit. Our company is able to offer data circuits to the Applicants service area with speeds from T-1 to Gb ethernet.

Submitter: Xpressweb Internet Services, Inc.

Comment: This application's proposed coverage area overlaps an area in which we (Xpressweb Internet Services) currently provide service. The applicant has listed Fredonia, Arizona as "underserved", which is incorrect. We currently provide greater than 3 Mbps service there, as does the local incumbent telephone company, South Central Communications

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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Coconino 7 for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NE_Cedar

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:** Hartington Telecommunications Co., Inc.

**Comment:** Hartington Telecommunications Co., Inc. 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. Hartington Telecommunications Co., Inc. is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. Hartington Telecommunications Co., Inc. overlapping broadband service area, at a minimum defined as 768k downstream and 200k upstream are displayed on the associated mapping tool. In the area of overlap, 100% of households have access to facilities-based broadband service and the rate of broadband subscribership for residential households and business establishments exceeds 40%. Hartington Telecommunications Co., Inc. also advertises broadband transmission speeds of at least 3 Mbps downstream within the area of overlap. Accordingly, such area is not underserved.

**Submitter:** Northeast Nebraska Telephone Company

**Comment:** Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is greater than 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.
-----Service Area:  ND_Williams

Submitter:  Nemont Telephone Cooperative, Inc.

Comment:  The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA) and a broadband subscription rate of over 40%.

Submitter:  Missouri Valley Communications, Inc. dba Nemont

Comment:  The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in the area. This funded service area has been defined as 'unserved' when Nemont can demonstrate that, not only is the designation of "unserved" not applicable, this area does not qualify as 'underserved'. The services that Nemont offers and provides in this proposed funded service area far exceed the thresholds set of more than 10% of households having access to broadband service (as defined in the NOFA).

-----Service Area:  AZ_Gila

Submitter:  NPG Cable, Inc.

Comment:  NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.
Submitter: Cable One, Inc.

Comment: AZ Gila County - Globe System - 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.

-----Service Area: OK_Grant

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

-----Service Area: ND_Dickey

Submitter: Dickey Rural Networks

Comment: Dickey Rural Networks demonstrates that it provides broadband service throughout Dickey County, which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural’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 Dickey Rural; 100% of the households in Dickey Rural’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; Dickey Rural 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.

-----Service Area:  TX_Bell

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

**Submitter:** Time Warner Cable Inc

**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.”
-----Service Area:  IA_Dallas

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:  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:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband - Dallas, for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  KS_Pratt

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 least ten years. Cox provides its customers in Kansas 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: Haviland Telephone Co., Inc.

Comment: Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Pratt County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes the towns of Cullison, Coats, Sawyer and adjacent rural areas, and rural areas of the telephone exchange areas of Haviland, Isabel.

Submitter: South Central Telephone Association, SCTelcom

Comment: SCTA, established in 1953, is submitting a response to dispute service availability for a portion of the applicant’s area. We would like to establish the fact that we are providing broadband access exceeding the 768 Kbps minimum as defined by the NOFA. We have been advertising High speed Broadband service of 1.5, 3, and 6Mbps in our response area.

-----Service Area: ID_Cassia

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:** Direct Communications Cable

**Comment:** Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least to 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain service areas. It appears that Satellite Broadband ARRA's application overlaps the company's area of service that includes the community of Declo. DCC provides wireless broadband service to this community with speeds up to 3mbps downstream and 512kbps upstream and DCC believes that this area is neither unserved or underserved in broadband services.

**Submitter:** Safelink Internet

**Comment:** Cassia County is already served by 7 last mile providers.
-----Service Area: SD_Lake

Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Lake County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application and that the proposed funded Service Area is not unserved or underserved. As demonstrated, 100% of households in ITC’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 ITC; 100% of the households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is 9.0% of households. Monies are currently being expended to upgrade facilities to offer minimum 1.5Mbps and higher speeds to the entire service area.

-----Service Area: CO_Huerfano

Submitter: Rye Telephone Company

Comment: Rye Telephone Company (RTC) has been providing high-quality communications services in the remote and rural communities of Rye, Colorado City and Kim, Colorado for 50 years. RTC has been offering broadband services since 2002 and can offer speeds up to 5 Mbps within its service areas.

In keeping with its long tradition of providing cutting-edge technologies, RTC utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. At considerable investment, RTC deployed a Fiber-to-the-Premise (FTTP) platform to serve the vast majority of its service areas.
RTC is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Because of RTC’s advanced network, important community anchor institutions including local and state government, public safety agencies, healthcare facilities, schools and libraries now have broadband services. Due to RTC’s entrepreneurial spirit, its dedication to its customers and through a substantial investment in advanced network facilities, these rural southern Colorado communities enjoy the same level of service as offered in metropolitan areas.

-----Service Area: ND_Ward

Submitter: Reservation Telephone Cooperative

Comment: The applicant contends the Proposed Funded Service Area (Ward County), which overlays an RTC service area, is unserved/underserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is underserved/unserved and has concluded it is not. According to RTC’s analysis, over 100 percent of the residential households in the drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. Of those households capable of being served, the broadband penetration rate is over 48 percent. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps throughout the service area, including in the area newspapers and magazines, direct mail and area radio stations.

RTC has or is also completed FTTH to portions of the area by the end of this year. Adding the capabilities of higher speeds, video services and expanding the area served with high quality FTTH capable of 1000 Mbps.

Submitter: SRT Communications Inc

Comment: The Applicant has applied for Broadband Stimulus support in areas (Cities/Townships/Census Blocks) identified below in the SRT Communications Inc. Service Area that do not qualify as unserved or underserved. SRT Communications Inc. provides 4 Mbps and 8 Mbps service in those areas.
<table>
<thead>
<tr>
<th>County Sub</th>
<th>Population</th>
<th>Housing Units</th>
<th>Households</th>
</tr>
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<tr>
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<tr>
<td>Surrey City</td>
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<td>313</td>
<td>307</td>
</tr>
</tbody>
</table>

-----Service Area: NE_RedWillow

Submitter: ATCJet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: BWTelcom

Comment: Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least 768/200 Kbps. The current residential take rate in the application area of 768/200 Kbps or higher is 46% of households. BWTelcom offers a 5 Mbps service.
Submitter: Moore and Liberty, Griggs County Telephone

Comment: MLGC currently provides broadband service via DSL, with advertised speeds up to 3 Mbps, within the Applicant’s proposed service area. According to MLGC’s analysis of information it has as the incumbent service provider, 100 percent of the residential households in its drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. MLGC’s subscriber penetration rate for broadband service is over 23 percent for the DSL service area drawn. Thus, MLGC satisfies two of the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because MLGC already meets these criteria, Applicant has erroneously claimed that the proposed service area is “underserved”. In addition to MLGC’s wireline services, MLGC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant’s proposed service area, with speeds of up to 2 Mbps.

The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution (“LTE”). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun. Verizon’s LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

Thus, MLGC already provides broadband services to the portions of Applicant’s proposed service area, and participates in the provision of mobile broadband services in that area as well.

MLGC continues to push DSL out further into its exchanges and is working on a FTTH plan for all of its areas bring broadband to all subscribers who want to subscribe.

Submitter: Inter-Community Telephone Co.

Comment: Inter-Community Telephone Co. provides Digital Subscriber Line (DSL) service in Steele County, ND at speeds exceeding the NOFA definition of broadband; therefore, none of Steele County, ND qualify as unserved per the NOFA. Satellite Broadband claims this area is unserved; however, ICTC knows this is not correct since we provide broadband service, as defined in the NOFA, to customers in this area.

The broadband service, at or above 768 kbps, is offered at every customer location in the city of Hope in Steele County and in the adjacent rural area of this community.
-----Service Area: TX_Borden

Submitter: Poka Lambro Telephone Cooperative, Inc.

Comment: Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

-----Service Area: WA_Stevens

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.
CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband Stevens for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: KS_Osborne
Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, offers broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or unserved as defined in the NOFA.

Submitter: Gorham Telephone Company

Comment: For the portion of this application that overlaps the Gorham Telephone Company serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Gorham Telephone Company offers a 3Mbps downstream service in this area. Lastly, Gorham Telephone Company supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

-----Service Area: ND_Emmons

Submitter: BEK Communications Cooperative

Comment: Satellite Broadband ARRA's proposed project covers exchanges served by BEK Communications Cooperative. BEK currently serves all its exchanges by an existing fiber network that extends from our corporate headquarters in Steele, ND. In this public notice response BEK is providing; 1) a map of the overlapping area where BEK provides broadband services, 2) BEK's DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from BEK within its service territory, 4) the number of residential households and business establishments subscribing to BEK's broadband service within the proposed service area, 5) the advertised download and upload speeds and service rates, and 6) comments addressing the existing services offered within the proposed funded service area.

-----Service Area: NM_Grant
Submitter: TransWorld network, Corp.

Comment: TransWorld Network Corp. provides broadband speeds of 3Mbps downstream in this proposed coverage area.

Submitter: Western New Mexico Telephone Company, Inc.

Comment: Respondent identifies locations within the Applicant’s service area that are not un-served or underserved.

-----Service Area: ID_Bonneville

Submitter: Silver Star Telephone Company, Inc.

Comment: Silver Star has served the rural communities of Star Valley, Wyoming and Silver Star Telephone Company, Inc. dba Silver Star Communications has served the rural communities of Star Valley, Wyoming and surrounding areas for over 60 years. Silver Star is a leader in providing broadband services to rural America, offering High Speed Internet Services ranging from 256k/128k to 20M/5M within its service territory. Currently, Silver Star offers broadband services with speeds exceeding 768k downstream to over 95% of its service territory. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper infrastructure and via its wireless facilities. Silver Star’s broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star’s investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is considered a premier employer in the area and employs over 60 local residents. Silver Star is committed to enhancing rural residents’ quality of life. Evidence of that commitment can be seen in Silver Star’s community service projects, scholarship program and sustainability initiatives.

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: DigitalBridge Communications Corp
**Comment:** DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 80% overlap of its coverage with the PFSA based on households served.

**Submitter:** KeyOn Communications

**Comment:** KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** MO_Harrison

**Submitter:** GVNW Consulting, Inc

**Comment:** Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----**Service Area:** CA_Mariposa
Sierra Telephone Company, Inc. and its affiliates (collectively "Sierra Telephone") hereby challenges this application for American Recovery and Reinvestment Act ("ARRA") funding in Sierra Telephone’s service territory. Sierra Telephone provides Broadband services over a Digital Subscriber Line platform in its service territory, in a manner that exceeds the federal National Telecommunications and Information Administration ("NTIA") and Rural Utilities Service ("RUS") unserved and underserved definitions. The area for which ARRA funding is sought in this application overlaps with the area that Sierra Telephone serves with broadband, and to the extent of such overlap, the application must be denied.

Sierra Telephone’s service territory is neither "unserved" nor "underserved." As defined in the Notice of Funds Availability ("NOFA"), an area is classified as unserved if 90% of households lack access to broadband services. The percentage of households that lack access to broadband services at the minimum broadband transmission speeds in Sierra Telephone’s service territory that overlap the applicant’s proposed unserved area is well below the 90% threshold.

As defined in the NOFA, an area is classified as underserved if one of the following criteria are met: (1) no more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed of 768 kbps downstream and 200 kbps upstream; (2) no fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second downstream in the proposed funded service area; or (3) the rate of broadband subscribership in the proposed funded service area is 40% or less. None of these standards for defining an underserved area can be met as to the portion of the proposed funded area that overlaps with Sierra Telephone’s service territory. The rate of broadband subscribership for households in Sierra Telephone’s service territory that overlap the applicant’s proposed underserved area is well above the 40% threshold. Further, Sierra Telephone provides facilities-based, terrestrial broadband service to more than 50% of the households in its service territory. Sierra Telephone does not have information in its possession regarding the advertised speeds for any fixed or mobile broadband offerings in the proposed funded service area. However, Sierra Telephone understands that a satellite-based Internet Service Provider, HughesNet, offers broadband speeds of 3mbps or greater.

As stated in the NOFA, ARRA grants are designed to fund areas where insufficient broadband connectivity exists (i.e. it is designed to target areas that are either unserved or underserved). This is not the case in Sierra Telephone’s service territory. In addition to the applicant's failure to meet the proper definitions of unserved and underserved relative to the proposed funded service area, the applicant also has demonstrated that service would not exist absent support from the grant funds. As described herein, services already exist in this area, including those provided by Sierra Telephone. Broadband is widely available in the area, and subscribership exceeds the 40% threshold. Since the portion of the proposed funding area that overlaps Sierra Telephone’s service territory does not meet the required criteria, the request for funding in Sierra Telephone’s service territory for this applicant must be denied.
-----Service Area:  KS_Linn

Submitter:  Craw-Kan Telephone Cooperative, Inc.

Comment:  Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

-----Service Area:  SD_Campbell

Submitter:  Valley Telecommunications Coop

Comment:  Valley Telecommunications Cooperative (Valley) 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. Valley is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. In the area of overlap, greater than 50% of households have access to facilities-based broadband service and the rate of broadband subscribership for residential households and business establishments exceeds 40%. Valley also advertises broadband transmission speeds of at least 3 Mbps downstream within the area of overlap.

-----Service Area:  TX_Stonewall
**Submitter:** Cap Rock Telephone Cooperative, Inc.

**Comment:** Stonewall County Texas is being labeled as an Unserved rural area. We challenge the position regarding Stonewall County Texas considered as an unserved location.

As the Incumbent Local Exchange Carrier in the rural area (see map) we provide landline and broadband service offerings throughout portions of Stonewall County Texas including the small communities of Peacock and Swenson. It should be noted the rural areas are sparsely populated and prove challenging when providing service. Cap Rock Telephone Cooperative, Inc. has and will continue to invest in providing services to customers in rural Texas including Stonewall County Texas.

Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Stonewall county rural area. Competition exists with limited potential customers. Satellite service providers are available to a number of residential and smaller numbers of businesses located in rural Stonewall County Texas. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: TX_Sherman

**Submitter:** XIT Rural Telephone Cooperative, Inc.

**Comment:** XIT Communications provides the town of Stratford with 1.5 Mbps download and 1.5 Mbps upload VDSL service. We currently provide VDSL to over 60% of the residential households in Stratford. Based on the NOFA definition of “unserved”, where at least 90 percent of households lack access to facilities-based, terrestrial broadband service at the minimum broadband transmission speed of 768 kbps downstream and 200 kbps upstream, the city of Stratford is NOT “unserved”, as Satellite Broadband ARRA Application LLC as indicated.

-----Service Area: ND_LaMoure

**Submitter:** Dakota Central Telecommunications
Comment: Dakota Central Telecommunications demonstrates that it provides broadband service throughout Lamoure County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 95% of households in Dakota Central’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 Dakota Central; 95% of the households in Dakota Central’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; Dakota Central 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: Dickey Rural Networks

Comment: Dickey Rural Networks demonstrates that it provides broadband service throughout LaMoure County, which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural’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 Dickey Rural; 100% of the households in Dickey Rural’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; Dickey Rural 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.

-----Service Area: TX_Baylor
Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: SD_Grant

Submitter: RC Technologies

Comment: As illustrated on the map below, the proposed funded service area of the applicant, Satellite Broadband ARRA Application LLC, proposes to serve an area currently served by RC Technologies (RCT). Within the 498 square mile area of overlap, RCT has the capability to provide broadband service with DSL service and 2.5GHz BRS/EBS wireless service with speeds of up to 2 Mbps down and 1 Mbps up.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Grant for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: MT_Teton

Submitter: 3 Rivers Telephone Cooperative, Inc.

Comment: This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----Service Area: MO_Bates

Submitter: Craw-Kan Telephone Cooperative, Inc.

Comment: Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

-----Service Area: SD_BonHomme

Submitter: Santel Communications

Comment: Santel Communications demonstrates that it provides broadband service throughout BonHomme County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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: HANSON COMMUNICATIONS

Comment: Ft. Randall Telephone Company (“Company”), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the communities of Tyndall and Tabor, SD which covers a portion of the proposed funded service area (“Area”) since 1996 after acquiring them from Qwest. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion the area is either unserved or underserved. At no time did the Applicant contact us to determine areas that presently have broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 98% of our end users in this area and of those 100% all are above the NOFA defined broadband speeds for unserved areas.

-----Service Area: NE_Kearney

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

Submitter: Glenwood Telephone Membership Corporation

Comment: Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

Submitter: Nebraska Central Telephone Co.
Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 67 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Kearney for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Hansford

Submitter: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Gruver, and Morse Texas for which funds are being requested in this application, we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.
-----Service Area: MN_Isanti

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant’s proposed service area.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: SD_Harding

Submitter: West River Telephone Cooperative Company

Comment: West River Telephone Cooperative Company demonstrates that it provides broadband service throughout Harding County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 75% of households in West River’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 West River; 75% of the households in West River’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: Consolidated Telcom

Comment: Consolidated Telcom service territory overlaps approximately 21.9% of the Satellite – Harding proposed funded service area (PFSA). Consolidated service more than 10% of the area marked as underserved by the application. In addition, Consolidated serves a portion of overlap area with service that is advertized at 4 meg.

-----Service Area: KS_McPherson

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 least ten years. Cox provides its customers in Kansas 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: Mutual Telephone Company

Comment: Mutual Telephone Company is a cooperative telephone company headquartered in Little River, KS. MTC has been in operation for 104 years. Through the organization and its subsidiary company, high-speed internet is available throughout western McPherson County in central Kansas.

Submitter: Moundridge Telephone Company

Comment: For the portion of this application that overlaps the Moundridge Telephone Company serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Moundridge Telephone offers a 4Mbps downstream / 1 Mbps upstream service in this area. Lastly, Moundridge Telephone supplies broadband service to over 50% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: Home Communications, Inc.
Comment: For the portion of this application that overlaps the Home Communications, Inc. serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Home Communications, Inc. offers a 3Mbps downstream and 5Mbps downstream service in this area. Lastly, Home Communications, Inc. supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: SD_Douglas

Submitter: Midstate Communications, Inc.

Comment: We serve this area and offer 3 mg broadband service.

Submitter: Santel Communications

Comment: Santel Communications demonstrates that it provides broadband service throughout Douglas County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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: Venture Communications Cooperative

Comment: Venture Communications Cooperative demonstrates that it provides broadband service throughout Jerauld County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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: Midstate Communications, Inc.

Comment: We serve this area and offer 3 mg broadband service.

Submitter: Santel Communications

Comment: Santel Communications demonstrates that it provides broadband service throughout Jerauld County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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.

-----Service Area:  WA_Adams

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas
where the application overlaps our existing broadband deployment. CenturyLink also provides data
showing broadband availability in our local telephone exchanges within the proposed service areas. We
will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with
broadband by other providers, which should be considered in the assessment of the application. Our
data combined with that of other broadband providers would likely show further duplication and
overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of SatelliteBroadband Adams 4 for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: KS_Marshall

Submitter: Blue Valley Tele-Communications, Inc.
Comment: Blue Valley Tele-Communications, Inc. (BVTC) is a rural telephone cooperative that has been serving these remote and rural communities for over 50 years. BVTC was one of the first companies in the nation to offer High-Speed DSL to both in-town and rural customers no matter the distance from the central office. BVTC is also building for future applications and higher demands for broadband by investing in a fiber to the premise network that will reach 100% of its customers in their telephone exchanges, and was one of the first companies in the nation to attempt this type of network. On top of these offerings, BVTC offers Internet services via cable modems and wireless technologies to many communities that lie outside of their ILEC telephone exchanges.

As a cooperative, BVTC services are driven by customer need and demand and customers are represented by a Board of Directors to make sure those needs are being met. The company also employs a full-time economic development director to assist in growth of their service areas. BVTC is proud to be known as an industry leader in the broadband arena, and plans to continue leading the way in broadband development in the future.

-----Service Area: MN_Clearwater

Submitter: Garden Valley Telephone Company

Comment: Garden Valley Telephone Company ("GVTC"), a small rural operator and Rural Utilities Service ("RUS") Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application, LLC ("Satellite BB") proposed funded service area in the county of Clearwater, MN. Satellite BB has proposed broadband service for this area and it is already served by GVTC.

-----Service Area: KS_Cherokee

Submitter: Craw-Kan Telephone Cooperative, Inc.

Comment: Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend
broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

----Service Area:  ID_Gooding

Submitter:  DigitalBridge Communications Corp.

Comment:  DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 80% overlap of its coverage with the PFSA based on households served.

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: Safelink Internet

Comment: Gooding County already has 5 last mile providers serving the area.

-----Service Area: TX_Hamilton

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline
and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in Hamilton County, TX, an area covered by Satellite Broadband’s Hamilton County broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 77% of its potential households. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. Central Texas’ provision and advertising of broadband service, coupled with the combined penetration rate of all broadband providers, should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

-----Service Area: TX_Coryell

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.
This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in Coryell County, TX, an area covered by Satellite Broadband’s Coryell County broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 49% of its potential households. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds
of 3 Mbs and higher. Central Texas’ provision and advertising of broadband service, coupled with the combined penetration rate of all broadband providers, should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

-----Service Area:  NE_Rock

Submitter:  Northeast Nebraska Telephone Company

Comment:  Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and while demand for Broadband service in this rural area has not reached the 40% target rate, we are confident that it will.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

Submitter:  Nebraska Central Telephone Co.
Comment: The respondent (Nebraska Central Telephone Company) believes that the applicant Satellite Broadband LLC has misinterpreted the availability of Broadband Internet access service in the response polygon area that represents the respondent’s service area. The respondent is a Local Exchange Carrier (Common Carrier) that offers wireline facilities based Broadband (high speed) Internet access service in the overlap area of the PFSA.

Respondent can provide Broadband Internet access service exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream. The advertising copy shows that the basic package of Broadband offered by the respondent exceeds the minimum speeds for categorization of a PFSA as “unserved”. As such, the applicant’s request for funds based on the area being “unserved” should be rejected.

In some cases, respondent does not cover an entire zip code with its response polygon, although the business counts generated by the system include all businesses in a reported zip code. As a result some of the business counts reflected in the “Businesses in Zip codes in Polygon” count are not included in respondent's response polygon (overlap area).

-----Service Area: WA_Klickitat

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.
---Service Area: MN_Wadena

Submitter: West Central Telephone Association

Comment: West Central Telephone Association ("WCTA") a small rural operator and Rural Utilities Service Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application LLC ("Satellite BB") application for a portion of the Satellite BB proposed funded service area that falls within the boundaries of the WCTA telephone exchanges. Since incorporating in October of 1950, WCTA serving area has included portions of Becker, Cass, Hubbard, Ottertail, Todd and Wadena Counties ("service territories") with the majority of their service area in Wadena County.

---Service Area: CO_Crowley

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline
and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  KS_Phillips

Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

-----Service Area:  OK_Blaine

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area:  NV_WhitePine

Submitter: Wirelessbeehive.com LLC
Comment: This area is current not underserved. Wirelessbeehive.com serves this area with high speed internet.

-----Service Area: NE_Cass

Submitter: jagWIRELESS

Comment: To Whom It May Concern:

Hello, my name is Danny Olsen and I am writing this on behalf of my employer, jagWIRELESS. jagWIRELESS specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrums 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 50 tower sites. In the areas we provide service we often compete with wire-line 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 that Satellite Broadband ARRA Application LLC has requested funds to build a network in Cass County, NE. from the Broadband stimulus program. I wish to submit a dispute regarding the “underserved” designation of this area by Satellite Broadband ARRA Application LLC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both or organization to provide quality services.

The areas which Satellite Broadband ARRA Application LLC intends to provide service already have 2 or more local providers and can also receive mobile broadband services from various national mobile providers.

<table>
<thead>
<tr>
<th>City/Area</th>
<th>Cable Internet</th>
<th>DSL Internet</th>
<th>Wireless Internet</th>
<th>Mobile Provider</th>
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</thead>
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<tr>
<td>Alvo village</td>
<td>No</td>
<td>Windstream</td>
<td>jagWIRELESS, Future Technologies</td>
<td>Sprint, Verizon</td>
</tr>
<tr>
<td>Village</td>
<td>Windstream</td>
<td>jagWIRELESS, Future Technologies</td>
<td>Sprint, Verizon</td>
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<td></td>
</tr>
<tr>
<td>Avoca village</td>
<td>No</td>
<td>Windstream</td>
<td></td>
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<tr>
<td>Cedar Creek village</td>
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<td>Windstream</td>
<td>Sprint, Verizon</td>
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<td>Windstream</td>
<td>Sprint, Verizon</td>
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<tr>
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<td>Charter</td>
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<td>Union village</td>
<td>No</td>
<td>Windstream</td>
<td>Sprint, Verizon</td>
<td></td>
</tr>
</tbody>
</table>

This area does not need additional broadband competition as it is well served by private organizations who have invested private dollars to services the broadband needs of the area residents.

**Underserved Criteria – Advertised Speeds**

Our wire-line competitor offers speeds of 6 Mbps in each of these service areas and Loganet offers speeds of 3 Mbps in each of the service areas. Attached is an advertisement showing that we do advertise these speeds which AlphaStar would like to service.

**Penetration Rate**
Our organization does regular marketing by multiple methods and we occasionally trade customers with the DSL carrier but we are most after the new residents to the area who are newly choosing between multiple carriers.

Our organization has been offering services in this market for 7 years. Based on our marketing and survey’s we find that market penetration between our services and those competing with us is well into the 60% range. The remaining 40% of households simply do not want or cannot afford any of the competing service providers, who offer services as low as $25/mo.

-----Service Area:  SD_Hanson

Submitter:  Santel Communications

Comment:  Santel Communications demonstrates that it provides broadband service throughout Hanson County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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.
-----Service Area:  SD_Shannon

Submitter:  HANSON COMMUNICATIONS

Comment:  Mt. Rushmore/Ft. Randall Telephone Company (“Company”), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the community of Red Shirt, SD  and covers a portion of the proposed funded service area (“Area”) since 1996 after purchasing it from Qwest Communications. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion that the area is either unserved or underserved. At no time did the Applicant contact us to determine the status of the area regarding broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 100% of our end users in this area and of those 100% all are above the NOFA defined broadband speeds for unserved areas.

-----Service Area:  SD_Turner

Submitter:  Knology, Inc.

Comment:  Knology is making broadband service available to approximately 51% of areas designated as "Underserved" in the Satellite Broadband proposed funded service area (PFSA) in Turner County, South Dakota. Satellite Broadband may not be meeting the definition of “Underserved” because Knology, along with other service providers, is likely providing broadband service to more than 40% of the households in the PFSA. Knology, along with other service providers in the area, may also be making broadband service available to more than 50% of the PFSA. Furthermore, Knology is advertising broadband service exceeding 3 mbps in underserved areas of the Satellite Broadband proposed funded service area. Information regarding Knology’s subscriber penetration and plans for upgrade are provided in the comments section.

Submitter:  HANSON COMMUNICATIONS
Comment: Ft. Randall Telephone Company ("Company"), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the communities of Viborg and Centerville, SD which covers a portion of the proposed funded service area ("Area") since 1996 after purchasing it from Qwest Communications. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion that the area is either unserved or underserved. At no time did the Applicant contact us to determine the status of the area regarding broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 97% of our end users in this area and of those 100% all are above the NOFA defined broadband speeds for unserved areas.

-----Service Area: TX_Dallas

Submitter: Time Warner Cable Inc

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.”

-----Service Area: KS_Ford

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of
United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.

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 least ten years. Cox provides its customers in Kansas 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.

-----Service Area: NE_Chase

Submitter: BWTelcom

Comment: Benkelman, Wauneta and Hartman Telephone Companies, dbs BWTelcom, current provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least 768/200 Kbps. The current residential take rate of residential Broadband service in this application area is 40% of households. BWTelcom offers a 5 Mbps service.
-----Service Area:  ND_Slope

Submitter:  Consolidated Telcom

Comment:  Consolidated Telcom service territory overlaps approximately 98% of the Satellite Broadband Application LLC Slope proposed funded service area (PFSA). Consolidated serves more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, Consolidated provides the entire overlap area with service that is advertised at 3 mbps in the entire overlap area and 20 Meg in part of the area.

-----Service Area:  SD_Corson

Submitter:  West River Telephone Cooperative Company

Comment:  West River Telephone Cooperative Company demonstrates that it provides broadband service throughout Corson County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in West River’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 West River; 100% of the households in West River’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.

-----Service Area:  UT_Weber

Submitter:  Qwest
**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Weber 2 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Mills

**Submitter:** Central Texas Telephone Cooperative, Inc.

**Comment:** Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in Mills County, TX, an area covered by Satellite Broadband’s Mills County broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 59% of its potential households. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. Central Texas’ provision and advertising of broadband service, coupled with the combined penetration rate of all broadband providers, should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

-----Service Area: OK_Woods

**Submitter:** Pioneer Telephone Cooperative

**Comment:** Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

**Submitter:** KanOkla Networks

**Comment:** KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative
services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

-----Service Area:  MT_JudithBasin

Submitter:  Central Montana Communications

Comment:  Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of unserved nor underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.

-----Service Area:  NE_KeyaPaha

Submitter:  Three River Telco

Comment:  Three River Telco currently provides service in their certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a “Served” area. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 44% of households. Three River Telco offers an 8 Mbps service.

-----Service Area:  OK_Grady

Submitter:  Pioneer Telephone Cooperative
**Comment:** Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

**Submitter:** Wichita Online Inc.

**Comment:** Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

**Submitter:** Windstream

**Comment:** Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.
The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second ("mbps") downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area:  KS_Finney

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide
selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy

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 least ten years. Cox provides its customers in Kansas 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: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves
from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

-----Service Area: WA_King

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access
lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: NE_Morrill

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

Submitter: Dalton Telephone Company

Comment: Dalton Telephone Company, Inc. (DTC) has been providing high-quality communications services to the residents of the rural communities and Villages of Dalton, Gurley, Lodgepole, Dix, Potter and Bushnell, Nebraska for 92 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Currently, 99% of DTC’s service areas have broadband capability. Because of DTC’s advanced network it can meet the local geographical challenges providing important
community anchor institutions including local government and public safety agencies with broadband services. This local presence also allows DTC to provide 24-7 customer service and support. Due to DTC’s entrepreneurial spirit and its dedication to its customers and through a substantial investment in advanced network facilities, the rural communities and surrounding areas of Dalton, Gurley, Lodgepole, Dix, Potter, and Bushnell, Nebraska enjoy the same level of service as offered in metropolitan areas.

-----Service Area: OK_Marshall

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: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----Service Area: MN_Stevens
Submitter: Runestone Telephone Association

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Donnelly and rural Cyrus exchanges in Stevens County that is currently served by Runestone Telephone Association. We currently serve the exchanges with a fiber-to-the-home network. In the public notice response Runestone Telephone Association is providing; 1) a map of the overlapping area Runestone provides broadband services, 2) Runestone'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: Federated Telephone Cooperative

Comment: i. Federated Telephone Cooperative service territory overlaps approximately 78% (based upon households passed) of the Satellite Broadband ARRA Application LLC – MN_Stevens proposed funded service area (PFSA). FTC provides service to more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, FTC provides service to the entire overlap area with service that is advertized at 3 Mbps or above. Federated has built a fiber to the premise network covering all of its exchanges.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

Service Area: NE_Banner

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other
broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area: MT_Fallon

Submitter: Mid-Rivers Communications

Comment: As shown on our response map, the majority of the Applicant's Proposed Funded Service Area is NOT UNDERSERVED. Mid-Rivers Communications is the incumbent Local Exchange provider for the Baker and Plevna communities and the balance of Fallon County, Montana. We currently provide and advertise broadband speeds of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in both Baker and Plevna. We have been providing affordable, reliable wireline broadband to the schools, ambulance services, fire departments, and other vital community facilities in these communities since before broadband was even available in many of Montana's larger cities, and currently serve over 700 broadband subscribers here. Mid-Rivers was also recently approved for a Rural Utilities Service (RUS) loan to bring Fiber to the Premise (FTTP) service to areas in the Baker and Plevna exchanges in the future.

-----Service Area: MT_SilverBow

Submitter: Southern Montana Telephone Company

Comment: Respondent offers broadband speeds of at least 768 kbps downstream and 512 kbps upstream to the Applicant's entire proposed funded service area that overlaps Respondent's service area.

-----Service Area: UT_Millard

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

Submitter: Wirelessbeehive.com

Comment: This area is current not underserved. Wirelessbeehive.com serves this area with high speed internet.

-----Service Area: TX_Delta

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: WA_Skamania

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.
------Service Area:  KS_Republic

Submitter:  Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment:  Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or unserved as defined in the NOFA.

Submitter:  Cunningham Communications

Comment:  Cunningham Telephone Company, with its affiliate Cunningham Communications has been providing high-quality communications services to the residents of the rural communities of northwestern Kansas for more than 65 years. It was one of the first providers in this remote area to offer broadband services eleven years ago. Currently, almost 100% of Cunningham’s service areas have broadband capability reaching speeds up to 10 Mbps.

In keeping with its long tradition of providing cutting-edge technologies, Cunningham has begun a Fiber To The Home (FTTH) project. Through this FTTH project, estimated to be completed in 2012, every customer in a majority of Cunningham’s service areas, even in the most remote rural areas, will have a direct fiber feed from their home and business to the world.

Cunningham is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Cunningham provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because Cunningham’s owners and employees have a personal stake in the communities where they work and live.

------Service Area:  ND_Sheridan
Submitter: North Dakota Telephone

Comment: North Dakota Telephone Company (NDTC) service territory overlaps approximately 14% of the Satellite Broadband Application LLC Sheridan County proposed funded service area (PFSA). The PFSA has portions of unserved and underserved areas. NDTC serves over 40% of the area designated as unserved. Therefore, the PFSA does not meet the requirement for an unserved area. NDTC’s broadband penetration is 15%. Therefore this area when combined with other incumbents that serve the remainder of the PFSA will show that this area does not qualify as unserved. This response replaces the response provided earlier.

Submitter: North Dakota Telephone

Comment: North Dakota Telephone Company (NDTC) service territory overlaps approximately 24.5% of the Satellite Broadband Application LLC Sheridan County proposed funded service area (PFSA). The PFSA has portions of unserved and underserved areas. NDTC serves over 60% of the area designated as unserved. Therefore, the PFSA does not meet the requirement for an unserved area. In addition, NDTC service the entire overlap area with broadband service and advertizes speeds at 6 MBPS. NDTC’s broadband penetration is over 40% Therefore this area when combined with other incumbents that serve the remainder of the PFSA will show that this area does not qualify as either unserved or underserved.

-----Service Area: NM_Chaves

Submitter: Penasco Valley Telephone Cooperative Inc.

Comment: Penasco Valley Telephone Cooperative Inc. is providing an upload document that shows our internet speeds along with pricing. By viewing the NM Chaves map you will notice that our ILEC area shaded in purple is the area that is served with high speed internet service. We can currently provide ADSL2+ internet to over 90% of the households in this area. The majority of our facilities are provided with the help of RUS loans and would require additional and redundant spending to fund this project.
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: ENMR Telephone Cooperative, Inc.
Comment: ENMR serves the northern part of Chaves County with DSL as part of its telephone service area.

Submitter: Plateau
Comment: Plateau currently serves several areas of Chaves County with a licensed fixed wireless service.

Submitter: Leaco Rural Telephone Cooperative Inc.
Comment: Leaco Rural Telephone Cooperative, Inc. has been offering broadband speed data service to subscribers for over 11 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served completely with high speed internet broadband service.

Submitter: PVT NetWorks, Inc.
Comment: PVT NetWorks, Inc. currently serves the NM Chaves map with high speed internet. Parts of the area are being served with 700 MHz service. PVT NetWorks, Inc. has uploaded an advertisement showing that it is offering high speed internet packages up to 3.0 Mbps. PVT NetWorks, Inc. leases excess capacity from Peñasco Valley Telephone Cooperative Inc. facilities for backhaul and transport. These facilities were initially provided through RUS loans. The proposed project would require additional and redundant federal spending. Excess capacity may be leased from Peñasco Valley Telephone Cooperative Inc. as a much more financially prudent alternative to duplicate federal funding.
Submitter: Moore and Liberty, Griggs County Telephone

Comment: MLGC currently provides broadband service via DSL, with advertised speeds up to 3 Mbps, within the Applicant’s proposed service area. According to MLGC’s analysis of information it has as the incumbent service provider, 100 percent of the residential households in its drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. MLGC’s subscriber penetration rate for broadband service is over 26 percent for the DSL service area drawn. Thus, MLGC satisfies two of the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because MLGC already meets these criteria, Applicant has erroneously claimed that the proposed service area is “underserved”. In addition to MLGC’s wireline services, MLGC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant’s proposed service area, with speeds of up to 2 Mbps.

The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution (“LTE”). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun. Verizon’s LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

Thus, MLGC already provides broadband services to the portions of Applicant’s proposed service area, and participates in the provision of mobile broadband services in that area as well.

MLGC continues to push DSL out further into its exchanges and is working on a FTTH plan for all of its areas bring broadband to all subscribers who want to subscribe.

Submitter: Mid-Rivers Communications

Comment: As indicated on our response map, much of Petroleum County, Montana, including the community of Winnett, is NOT UNSERVED as the Applicant has indicated. Mid-Rivers Communications, the Incumbent Local Exchange provider throughout this area, currently provides and advertises broadband of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Winnett, and broadband meeting or exceeding the NOFA definition to other surrounding rural areas indicated on the map. We have also
recently been approved for a Rural Utilities Service (RUS) loan for future construction of Fiber to the Premise (FTTP) services in this Exchange.

-----Service Area: NE_Harlan

Submitter: ATCJet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

-----Service Area: NM_SantaFe

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.
Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area:  SD_Potter

Submitter:  Venture Communications Cooperative

Comment:  Venture Communications Cooperative demonstrates that it provides broadband service throughout Potter County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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.

-----Service Area: KS_Morton

Submitter: United Telephone Assn.

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s wireless EVDO RevA network supports wireless broadband at speeds up to 3.1 Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.

Submitter: Elkhart Telephone Co., Inc.
Comment:  Elkhart Telephone Co., Inc. is an established rural telecommunications company that has been providing service since 1956. Elkhart Telephone, in conjunction with its affiliate, Epic Touch Co., provides a wide range of telecommunications services to consumers in Kansas and Oklahoma. Those services include local and long distance telephone service, wireless PCS service, cable television, and high speed Internet access. Satellite Broadband ARRA Application LLC’s proposed service area includes coverage of Elkhart Telephone’s entire service territory in rural Morton County, Kansas. Elkhart Telephone already provides “broadband” service, as that term is defined in the Notice of Funds Availability, in Morton County, Kansas. Accordingly, Satellite Broadband ARRA Application LLC’s application for broadband funding should not be granted.

-----Service Area:  MT_Carter

Submitter:  West River Telephone Cooperative Company

Comment:  West River Telephone Cooperative Company demonstrates that it provides broadband service to a portion of Carter County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in West River’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 West River; 100% of the households in West River’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:  Mid-Rivers Communications

Comment:  As shown on our response map, the community of Ekalaka and certain other areas of Carter County, Montana, are NOT UNSERVED OR UNDERSERVED as the Applicant has indicated. Mid-Rivers Communications is the Incumbent Local Exchange provider for the community of Ekalaka and the northern half of Carter County, Montana, which is one of the most rural counties in the Nation. We currently provide and advertise broadband at speeds up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Ekalaka and broadband of at least 768 Kbps downstream in other areas as indicated on the response
map. We have been providing affordable, reliable wireline broadband to the schools, critical access healthcare, city/county administration buildings, and other vital community facilities since before broadband was even available in many of Montana’s largest cities. Mid-Rivers has Fiber to the Premise (FTTP) build-out plans for additional areas of Carter County that are currently unserved to be funded through a recently approved Rural Utilities Service (RUS) loan, and we have also applied for ARRA funding to serve some of the most remote subscribers to the North and Southwest of Ekalaka.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 42% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Satellite Broadband ARRA Application LLC’s application for broadband funds support in Carter County Montana, their comments that the areas are unserved or underserved are not true. We serve a part of Carter County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.
Range is very sensitive to its member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA Application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Carter County. Range has 3 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area: IA_Ringgold

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: OK_Major

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of
our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

-----Service Area: OR_Harney

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink
committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: CO_Lincoln

Submitter: Eastern Slope Rural Telephone Association, Inc.

Comment: Eastern Slope Rural Telephone Association, Inc. (ESRTA) has been providing high-quality communications services to rural eastern Colorado for 57 years. Based on our history of serving difficult-to-serve areas that larger providers ignore, ESRTA is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work. To this end, ESRTA is capable of providing broadband services at speeds exceeding 5 Mbps download.

ERSTA is a local company that provides much-needed jobs, 24-7 customer service and local offices. ERSTA is proud to count among its broadband customers community anchor institutions including schools, hospitals, local government offices and public safety agencies. It serves from a local perspective
because ERSTA’s owners, who are also its customers, have a personal stake in the communities where
y they work and live.

-----Service Area:  KS_Seward

Submitter:  Pioneer Communications, Inc.

Comment:  Pioneer Communications, a wireline telecommunications provider serving 10 counties in
western Kansas, has connected rural communities for more than five decades, and today delivers
telephone, cable television and high-speed Internet service.  Pioneer first became an Internet Service
Provider (ISP) in 1995 by introducing educational Internet networking services for the schools located in
its service area, and soon thereafter, made Internet access available commercially to Pioneer’s
telephone customers. Currently, Pioneer provides broadband internet access to 100% of its wireline
service area using both Digital Subscriber Line (DSL) over its telephony infrastructure, and data over
cable modems via its cable television system.

The Proposed Service Area for the referenced application covers a portion of Pioneer Communications’
territory in the northwest corner of Seward County and erroneously classifies the area as unserved.
Pioneer offers broadband not only to those customers living within towns, but also to those residing far
from city limits, places such as northwest Seward County.

Pioneer consistently and effectively advertises the availability of its broadband internet access
throughout its wireline service area and specifically the exchanges of Moscow and Satanta. Pioneer
advertises its broadband internet access service in local newspapers, on television, through billing
inserts, and on the radio. Pioneer also advertises by providing sponsorship to area high school events
and other community activities. The attached document is an example of ads that were distributed
within Pioneer’s territory in Seward County.

In conclusion, Pioneer Communications re-emphasizes the fact that it offers broadband internet access
to any customer within its wireline service area. Therefore, Pioneer contends that there are no
unserved areas within its territory and the referenced application incorrectly characterizes a portion of
Pioneer’s service area in Seward County. To this extent, Pioneer asserts that its territory in Seward
County is well-served by broadband internet access and the above referenced application does not meet
the conditions of “unserved” as set forth in the NOFA.
Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Stelera Wireless, LLC
Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Liberal will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

-----Service Area: CO_Mesa

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The towns of Clifton, Fruita, Fruitvale, Grand Junction, Orchard Mesa, Redlands, and Palisade are served by Stelera Broadband, a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area: NE_Thomas

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.
The applicant’s PFSA contains 325 households of which 240 households or 74 percent have access to broadband from Consolidated. Therefore, the PFSA does not qualify as underserved based on the availability criterion. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

------Service Area:  TX_Denton

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas
where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Time Warner Cable Inc
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.”

-----Service Area: TX_Oldham

Submitter: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Adrian Wildorado and Vega, Texas for which funds are being requested in this application, we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

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.

-----Service Area:  WY_Teton

Submitter:  Gold Star Communications, LLC

Comment:  Gold Star Communications, LLC dba Silver Star Wireless (Silver Star) provides 3G Data Services via its EVDO network, ranging in speed up to 3.1Mb/s within at least 80% of its service area. Silver Star has provided mobile wireless carrier services to rural Wyoming and Idaho residents since 2004. Currently, Silver Star provides mobile voice services to over 3,700 rural customers; of those customers 265 subscribe to Silver Star's high-speed data services, and at least 90% of the population
within its service area has access to 3G Data Services. Silver Star’s wireless mobile 3G services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce while they’re on the move. Silver Star is constantly improving its facilities to better serve its customers, while maintaining the delicate balance between affordability and value. Silver Star’s commitment to its customers is evident in its dedication to quality, reliability and price.

-----Service Area: NE_Richardson

Submitter: Southeast Nebraska Communications

Comment: Southeast Nebraska Communications (SNC) provides standard high speed broadband internet service with download speeds up to 3 Mbps for an affordable rate of $39.95/month; and offer download speeds of up to 5 Mbps. SNC offers internet access to 100% of the households in its service territory; and it has a subscriber rate of over 40% of households. There are no installation fees or contracts to sign for SNC's fast and reliable broadband service.

-----Service Area: CO_Adams

Submitter: Roggen Telephone Enterprises, Inc.

Comment: Roggen Telephone Cooperative Company and its affiliate Roggen Telephone Enterprises, Inc. (RTE) has been providing high-quality communications services to the residents of rural communities of northeastern Colorado for 75 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Building on its reputation for providing cutting-edge technologies to service areas that other larger providers ignore, RTE provides broadband services at speeds up to 3 Mbps to 100% of its service areas. RTE also provides service to rural neighboring communities within a 1200 square mile radius.

RTE is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service, technical support, and local offices. RTE provides needed broadband services to community anchor institutions including schools, local and state government offices and public safety agencies. Due to the geographical remoteness of the areas where RTE serves, academic studies, both at
the secondary and university levels, are often online. Many of RTE’s customers rely on its broadband service, as well as its computer service and sales, for educational purposes.

RTE, along with its parent company, strives to provide superior communications services to our customers and communities. We look forward to a future, based on our past performance, of innovation and a commitment to excellence. We serve our customers with pride and respect, and, among our employees, have formed an enthusiastic team with the skills, abilities, and dedication that make a positive difference in the communities we serve. Our customers rely on us to be a leader in the industry, providing a bridge to their communications future.

Submitter: Eastern Slope Rural Telephone Association, Inc.

Comment: Eastern Slope Rural Telephone Association, Inc. (ESRTA) has been providing high-quality communications services to rural eastern Colorado for 57 years. Based on our history of serving difficult-to-serve areas that larger providers ignore, ESRTA is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work. To this end, ESRTA is capable of providing broadband services at speeds exceeding 5 Mbps download.

ERSTA is a local company that provides much-needed jobs, 24-7 customer service and local offices. ERSTA is proud to count among its broadband customers community anchor institutions including schools, hospitals, local government offices and public safety agencies. It serves from a local perspective because ERSTA’s owners, who are also its customers, have a personal stake in the communities where they work and live

-----Service Area: WY_Weston

Submitter: RT Communications, Inc

Comment: RT Communications, Inc. (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Weston County and the communities of Upton, Osage and Newcastle. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade
throughout our serving territory. 80% of RT customers in this service area including subscriber households and business locations are capable of receiving DSL speeds in excess of 768k downstream and 200k upstream. Approximately 46% of residential households subscribe to the DSL service that is in excess of 768k downstream and 200k upstream. This service area is neither unserved or underserved as shown in the applicant's proposal.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) serving 2235 access lines in rural Northeastern Wyoming. Range service area includes Johnson, Crook, Weston, Campbell and Sheridan Counties. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 50% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Wyoming is not unserved or underserved as represented in the applicant’s proposal.

With respect to Satellite Broadband ARRA Application LLC’s application for broadband funds support in Weston County Wyoming, their comments that the areas are unserved or underserved are not true. The areas Range serves that were applied for in their application in Weston County are capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.
Range is very sensitive to its member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Weston County Wyoming. Range has 2 employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area: WA_Clallam

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: WaveDivision Holdings, LLC

Comment: WaveDivision Holdings, LLC (“Wave”) is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC(“Applicant”) for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is approximately 77%, significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.

Submitter: Qwest
Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Clallam 2 for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NV_Washoe

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.

-----Service Area: NE_McPherson

Submitter: KeyArt Comm.

Comment: We are providing broadband service through our internet company lakemac.net to the customers in this area.

Submitter: Consolidated Companies

Comment: Consolidated Companies is the parent company of four rural local exchange carriers, three of which provide telephone and broadband service to the PFSA for which the applicant has applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA.
The respondent is aware that Great Plains Communications also provides broadband service within the applicant’s proposed PFSA.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of unserved, that 90 percent of households in the PFSA lack access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be unserved. This application should be rejected.

-----Service Area:  TX_Brewster

Submitter:  Big Bend Telephone Co.

Comment:  Big Bend Telephone Company, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----Service Area:  MT_Cascade

Submitter:  DigitalBridge Communications Corp.
Comment: DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Bresnan) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 20% overlap of its coverage with the PFSA based on households served.

Submitter: 3 Rivers Telephone Cooperative, Inc.

Comment: This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----Service Area: KS_Wilson

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: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive
competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area:  CO_Jefferson

Submitter:  US Cable of Coastal-Texas, L.P.

Comment:  US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband Jefferson for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  SD_Hughes

Submitter:  Venture Communications Cooperative

Comment:  Venture Communications Cooperative demonstrates that it provides broadband service throughout Hughes County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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.

-----Service Area:  NE_Hooker

Submitter:  Consolidated Companies Inc.

Comment:  Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding.  Consolidated Companies’ response polygon has been input to the mapping tool.  One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant’s PFSA contains 334 households of which 271 households or 81 percent have access to broadband from Consolidated.  Therefore, the PFSA does not qualify as underserved based on the availability criterion.  The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband.  The applicant’s PFSAs would still be underserved.  This application should be rejected.
-----Service Area:  CO_ElPaso

Submitter:  Baja Broadband Operating Company LLC

Comment:  Baja Broadband provides cable modem service in Fort Carson at speeds up to 10 Mbps. Other providers in the service area include Qwest (DSL).

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband ElPaso2 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  MT_Phillips

Submitter:  Nemont Telephone Cooperative, Inc.

Comment:  The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in the area. Nemont can demonstrate that, of the three criteria used to qualify an area as underserved, none are applicable to this proposed funded service area in the area served by Nemont. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA), at least 40% subscription rate and advertising at least three megabits per second (3Mbs).
Submitter: Central Montana Communications

Comment: Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.

-----Service Area: OK_McClain

Submitter: Chickasaw Telephone Co.

Comment: Chickasaw Telephone Company has been offering broadband speed data service to subscribers through its subsidiary Bright Net Oklahoma for 11 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary, is served with high speed internet broadband service.

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber.
WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”
-----Service Area: CA_Calaveras

Submitter: Calaveras 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 California areas of Copperopolis and Jenny Lind are not underserved and do not qualify for Broadband Stimulus funds. Calaveras Telephone Company (Calaveras) provides broadband to 100% of the residences and businesses in Copperopolis and Jenny Lind. Data to further substantiate this response can be found in the comments section below.

Submitter: Volcano Communications Group

Comment: Based on the definition of unserved and underserved in the Notice of Funds Availability (NOFA) regarding the American Recovery and Reinvestment Act of 2009, the California community of West Point is neither unserved nor underserved and does not qualify for Broadband Stimulus funds. Volcano Communications Group (Volcano) provides broadband to 95% of the residences and businesses in West Point, Ca. Data to further substantiate this response can be found in the comments section below.

-----Service Area: UT_Garfield

Submitter: South Central Utah Telephone Association

Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service in portions of Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant's characterization of Garfield county, Utah as being unserved and underserved is entirely without merit. In 2007, we engaged an independent market research firm to determine, among other things, broadband adoption rates in the St. George, Utah BTA, which includes all of Beaver, Garfield, Iron, Kane and Washington counties. It was determined with a
95% Confidence Level and a Confidence Interval of +/- 5% that Broadband adoption in the St. George BTA was 56%. Clearly the area is neither unserved nor underserved.

-----Service Area:  ID_Boise

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:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ND_Stark

**Submitter:** Consolidated Telcom

**Comment:** Consolidated Telcom service territory overlaps approximately 8.5% of the Satellite Broadband Application LLC Stark proposed funded service area (PFSA). Satellite Broadband Application LLC designates this area as underserved. In the overlapping area, Consolidated service advertises 20 meg service in a portion of the overlap and 3 Mbps in 95% of the overlap area. The penetration for Consolidated alone is over 40% in the overlap area. Consolidated’s affiliate serves another portion of the PFSA. Together the two companies have a penetration of over 40% of the households with broadband.

-----Service Area: CO_Morgan
Submitter: Roggen Telephone Enterprises, Inc.

Comment: Roggen Telephone Cooperative Company and its affiliate Roggen Telephone Enterprises, Inc. (RTE) has been providing high-quality communications services to the residents of rural communities of northeastern Colorado for 75 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Building on its reputation for providing cutting-edge technologies to service areas that other larger providers ignore, RTE provides broadband services at speeds up to 3 Mbps to 100% of its service areas. RTE also provides service to rural neighboring communities within a 1200 square mile radius.

RTE is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service, technical support, and local offices. RTE provides needed broadband services to community anchor institutions including schools, local and state government offices and public safety agencies. Due to the geographical remoteness of the areas where RTE serves, academic studies, both at the secondary and university levels, are often online. Many of RTE’s customers rely on its broadband service, as well as its computer service and sales, for educational purposes.

RTE, along with its parent company, strives to provide superior communications services to our customers and communities. We look forward to a future, based on our past performance, of innovation and a commitment to excellence. We serve our customers with pride and respect, and, among our employees, have formed an enthusiastic team with the skills, abilities, and dedication that make a positive difference in the communities we serve. Our customers rely on us to be a leader in the industry, providing a bridge to their communications future.

Submitter: Wiggins Telephone

Comment: Wiggins Telephone Association has an existing RUS approved construction project design and $29.7 million loan in place to provide broadband access throughout the entire service area with Fiber to the Home. The town of Wiggins and surrounding area is now served by FTTH placed in service beginning in the fall of 2008. All bandwidth packages offered to all areas are at FCC minimum (768 Kbps) and above.
Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The towns of Fort Morgan and Brush will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

-----Service Area: ID_Lemhi

Submitter: Custer Telephone Cooperative, Inc.

Comment: Custer Telephone Cooperative, Inc. has provided Broadband service in the identified map area for the past several years. We currently provide Broadband service with the following technologies: Fiber to the node (DSL), Fiber to the Home (FTTH), DOCSIS Cable modem service, and Non-licensed wireless service.

Our primary capital funding source to invest in the latest broadband technology is the United States Department of Agriculture’s RUS (Rural Utility Service) program.

The other broadband providers that we compete with in areas we serve are Verizon Wireless, Alltel Wireless, AT&T Wireless, CenturyTel, and Wild Blue Satellite.

We respectfully request Satellite Broadband ARRA Application LLC's application be denied for the following reasons: (1) Affordable Broadband service is being provided through funding from USDA’s RUS program, (2) Competition currently exists in the area, (3) The applicant failed to adequately research the area for existing providers and therefore provided incorrect or untrue information in their application.
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. 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 which establishes that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area.

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: KS_Miami

Submitter: MoKan Dial Telephone

Comment: MoKan Dial, Inc. demonstrates that the area the Applicant proposes to serve which overlaps MoKan Dial, Inc.’s service area does not meet any of the criteria which categorize an area as unserved or underserved.

As demonstrated, 80% of households in MoKan Dial, Inc.’s service area, including those areas which are part of the Applicant’s proposed funded 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 MoKan Dial, Inc. Therefore, the Applicant’s claim that this overlapping area is underserved due to limited access is incorrect. In addition, MoKan Dial, Inc. demonstrates that it advertises speeds of at least 3 Mbps downstream in its service area and that the rate of broadband subscribership for Miami County and Franklin County is significant.

-----Service Area: MO_Vernon

Submitter: Craw-Kan Telephone Cooperative, Inc.

Comment: Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.
The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: KS_Jackson

Submitter: Giant Communications LLC

Comment: We currently provide CATV and CM Internet in the following cities in Jackson County

Circleville, KS
Holton, KS
Hoyt, KS
Mayetta, KS

-----Service Area: KS_Trego
Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, offers broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

Submitter: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

-----Service Area: NM_Sierra
Submitter: Baja Broadband Operating Company LLC

Comment: Baja Broadband provides cable modem service in Sierra County also including Truth or Consequences, Elephant Butte, Williamsburg at speeds up to 6Mbps. Other broadband providers include Windstream, which advertises speeds up to 12 Mbps.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an unserved area. Windstream offers facilities-based, terrestrial broadband service at advertised speeds of greater than 768 kbps downstream and 200 kbps upstream to some of the households within the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as unserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “unserved area” as follows: “Unserved area means a proposed funded service area, composed of one or more contiguous census blocks, where at least 90 percent of households in the proposed funded service area lack access to facilities-based, terrestrial broadband service, either fixed or mobile, at the minimum broadband transmission speed (set forth in the definition of broadband above). A household has access to broadband service if the household can readily subscribe to that service upon request.”

-----Service Area: CO_Logan
Submitter: Haxtun Telephone Co.

Comment: Haxtun Telephone Company demonstrates that the application filed by Satellite Broadband ARRA Application LLC is incorrect in its claim that the area it proposes to serve which overlaps Haxtun Telephone’s service area is unserved. Further, Haxtun Telephone demonstrates that the area Satellite Broadband ARRA Application LLC proposes to serve which overlaps Haxtun Telephone’s service area does not meet all of the criteria which categorize an area as underserved.

As demonstrated, 60% of households in Haxtun Telephone’s service area, including those areas which are part of Satellite Broadband ARRA Application LLC’s proposed funded 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 Haxtun Telephone. Therefore Satellite Broadband ARRA Application LLC’s claim that this overlapping area is unserved is incorrect. Further, no part of this overlapping area is underserved on the basis of access to broadband service. In addition, Haxtun Telephone demonstrates that the rate of broadband subscribership for households in [the part of the proposed funded service area which overlaps Haxtun Telephone’s service area] [its service area] is significant.

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Sterling will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

-----Service Area: CO_Grand
Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC Grand for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: CO_Saguache

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.
Service Area: NE_Jefferson

Submitter: Diller Telephone Company

Comment: Diller Telephone Company (DTC) provides broadband internet service at download speeds up to 1.5 Mbps. 100% of the households in the DTC service area are capable of receiving broadband internet service of at least 768kbps/200kbps. The subscriber rate is greater than 40% for the DTC service area.

Service Area: KS_Atchison

Submitter: Rainbow Communications

Comment: Rainbow Telecommunications Association, Inc. dba Rainbow Communications is a phone, Internet, and cable TV service provider in rural northeast Kansas. The telecommunications company is headquartered in Everest, Kansas, and has been in existence since 1952. While Rainbow Telecommunications has offered high speed DSL-Internet for many years, the company has since expanded its service offerings in 2006 through a CLEC operation, Carson Communications dba Rainbow Communications. Rainbow Communications is able to provide high speed DSL, cable modem, and fiber-based Internet in many northeast Kansas rural communities. It is our goal to provide communication technology which rivals or surpasses those available in metro areas.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where
funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Service Area: MN_Pine

Submitter: US Cable of Coasta-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

Service Area: OK_Pittsburg

Submitter: Canadian Valley Telephone Company

Comment: Canadian Valley Telephone Company (“Canadian Valley”) is an RUS borrower and provides broadband access capability to 100% of the households and businesses within its service territory, and specifically, its territory that overlaps the applicant’s proposed funded service area (“PFSA”). Canadian Valley provides four (4) broadband internet service plans, including a plan with downstream speeds of 3Mbps and maintains a 43% broadband subscribership for the PFSA. Currently, 67% of Canadian Valley’s residential broadband customers subscribe to an enhanced broadband plan, which include a 960Kbps plan and a 1.5Mbps plan. Approximately 30% these of enhanced service subscribers have
ordered the 1.5Mbps service. Canadian Valley continues to invest in its broadband network and will soon offer an IPTV service to 100% of its service territory. Additionally, Canadian Valley will be upgrading its upstream speeds from 512Kbps to 1Mbps and is planning a FTTH deployment in its service territory. Canadian Valley's broadband internet service offerings are priced competitively as is apparent from Canadian Valley's high subscriber penetration rates. The portion of the "PFSA" that encompasses Canadian Valley's serving territory does not meet the criteria of unserved or underserved.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Cross Telephone Company LLC

Comment: Cross Telephone Company LLC through its subsidiary, Cross Cable Television, Inc., has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cross Cable Television, Inc. also offers IPTV service to its subscribers within the exchanges Cross serves.

Submitter: Cross Wireless L.L.C.

Comment: Cross Wireless, LLC, has been offering broadband speed data service to its subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the wireless service area is served with high speed internet broadband service.

Submitter: Cherokee Telephone Company
Comment: Cherokee Telephone Company (CTC) currently provides a wide array of broadband offerings within the proposed funded service area. CTC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. CTC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Competitive Local Exchange Carriers, and CTC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through CTC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. CTC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for
last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: SD_Union

Submitter: Knology, Inc.

Comment: Knology is making broadband services available to approximately 29% of areas designated as "Underserved" in the Satellite Broadband proposed funded service area (PFSA) in Turner County, South Dakota. Satellite Broadband may not be meeting the definition of “Underserved” because Knology, along with other service providers, may be providing broadband services to more than 40% of the households in the PFSA. Knology, along with other service providers in the area, may also be making broadband service available to more than 50% of the PFSA. Furthermore, Knology is advertising
broadband service exceeding 3 mbps in underserved areas of the Satellite Broadband proposed funded service area. Information regarding Knology's subscriber penetration and plans for upgrade are provided in the comments section.

-----Service Area:  SD_Davison

Submitter:  Midstate Communications, Inc.

Comment:  We serve this area and offer 3 mg broadband service.

Submitter:  Santel Communications

Comment:  Santel Communications demonstrates that it provides broadband service throughout Davison County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel'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 Santel; 80% of the households in Santel'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; Santel 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 subscribeship for the proposed funded Service Area is greater than 40 percent of households.

-----Service Area:  ND_Stutsman
Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, ND Stutsman for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: WA_Lincoln

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: KS_Mitchell

Submitter: Cunningham Communications

Comment: Cunningham Telephone Company, with its affiliate Cunningham Communications has been providing high-quality communications services to the residents of the rural communities of northwestern Kansas for more than 65 years. It was one of the first providers in this remote area to offer broadband services eleven years ago. Currently, almost 100% of Cunningham’s service areas have broadband capability reaching speeds up to 10 Mbps.

In keeping with its long tradition of providing cutting-edge technologies, Cunningham has begun a Fiber To The Home (FTTH) project. Through this FTTH project, estimated to be completed in 2012, every
customer in a majority of Cunningham’s service areas, even in the most remote rural areas, will have a
direct fiber feed from their home and business to the world.

Cunningham is a local company that helps anchor the communities it serves. It provides much-needed
jobs, 24-7 customer service and local offices. Cunningham provides necessary broadband services to
community anchor institutions including schools, libraries, local government offices and public safety
agencies. It serves from a local perspective because Cunningham’s owners and employees have a
personal stake in the communities where they work and live.

Submitter: Wilson Telephone Co Inc dba Wilson Communications

Comment: Wilson Communications has been providing high quality and leading technology
telecommunications services to rural Kansans for more than sixty years. Wilson Communications began
offering high speed internet access service to our customers in the late 1990’s. We continued to expand
our fiber network and now can provide broadband services to 100% of our customers. Wilson
Communications continues to make investments in fiber optic facilities to ensure our customers have
access to the latest broadband technology. We provide broadband to critical community anchor
institutions including schools, rural health clinics, and public libraries. We are a full service provider of
communications services and are able to bundle services offering discounts to our customers. Wilson
Communications is a community based company, providing volunteerism, and other forms of support to
each of the seven communities we serve.

-----Service Area: ND_Cass

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:  MLGC LLC

Comment:  MLGC currently provides broadband service via cable modem, with advertised speeds up to 3 Mbps, within the Applicant’s proposed service area. According to MLGC’s analysis of information it has as the incumbent service provider, 100 percent of the residential households in its drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. MLGC’s subscriber penetration rate for broadband service is over 22 percent for the cable service area.
drawn. Thus, MLGC satisfies two of the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because MLGC already meets these criteria, Applicant has erroneously claimed that the proposed service area is “underserved”. In addition to MLGC’s wireline services, MLGC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant’s proposed service area, with speeds of up to 2 Mbps.

The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution (“LTE”). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun. Verizon’s LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband East for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Knox

**Submitter:** KeyOn Communications

**Comment:** KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: UT_Utah

**Submitter:** Direct Communications - Cedar Valley
Comment: Direct Communications - Cedar Valley (DCCV) is capable of providing 100% of its Eagle Mountain local exchange service territory with broadband services. All potential subscribers can receive at least 12mbps download/1 mbps upload DSL. Roughly 20% of potential subscribers are on our FTTP network and they can all receive up to 20mbps/5mbps broadband services. It appears that Satellite Broadband ARRA application overlaps DCCV's local service territory that includes the Eagle Mountain community and the company believes that its territory is neither unserved nor underserved.

-----Service Area: MN_CrowWing

Submitter: Consolidated Telephone Company

Comment: Consolidated Telephone Company offers ADSL broadband technology with speeds up to 1.5M and ADSL2+ technology with speeds up to 10M and has a 47% average penetration of High Speed Internet to land line telephone customers in our service area.

Submitter: Emily Cooperative Telephone Company

Comment: The ARRA application indicates unserved/underserved for the Emily/Fifty Lakes area of Minnesota. This area is neither unserved nor underserved.

Submitter: Crosslake Communications

Comment: Crow Wing County, and Crosslake especially are not underserved, nor unserved. Crosslake is over 50% complete with a Gpon FTTH build, with ADSL2+ in all other areas, allowing speeds up to 40Meg download. Further, the recent MTA study shows rural Minnesota with 92% broadband availability with 6meg download average. Finally, Direct TV already has sat internet service available.

Right now, we are seeing no demand for our service offerings over 10 meg, and almost no requests for 10 meg service.

Submitter: Consolidated Telephone Company CLEC

Comment: Consolidated Telephone Company operates a Competitive Telephone Company in the Qwest territory in Brainerd and Nisswa MN and in the Embarq territory of Ironton and Crosby MN. We
offer Broadband services on Fiber Optic facilities in this area as well as a 700 MHZ wireless Broadband offering. We also provide ADSL broadband in the cities of Ironton and Crosby MN.

-----Service Area: TX_Hall

Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: Hall County Texas is being labeled as an Unserved and Underserved rural area. We challenge the position regarding Hall County Texas as an unserved and underserved location.

As the Incumbent Local Exchange Carrier in a Southwest corner of this rural area (see map) we provide landline and broadband service offerings to rural households in Hall County, Texas as well as Turkey, Texas. This community is the only populated location where Cap Rock Telephone Cooperative, Inc. is the provider of service. The rural areas are sparsely populated and providing services is not without challenge. Cap Rock Telephone Cooperative, Inc. will continue to invest in providing services to customers in rural Texas including Hall County Texas.

Cap Rock Telephone Cooperative, Inc. is one broadband service provider in the Hall County Texas. Competition exists with limited potential customers. Satellite service providers and wireless broadband opportunities are available to residential and smaller businesses located in rural Hall County Texas. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: MT_LewisAndClark

Submitter: Lincoln Telephone Company, Inc.

Comment: Lincoln Telephone Company can serve all households and businesses in our service area with at least 768k or greater.

Submitter: Bresnan Communications
Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: 3 Rivers Telephone Cooperative, Inc.

Comment: This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----Service Area: KS_Allen
Submitter:  Craw-Kan Telephone Cooperative, Inc.

Comment:  Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

Submitter:  LaHarpe Telephone Co., Inc.

Comment:  LaHarpe Telephone Company, Inc has expended more than $2,500,000 of a loan from USDA to construct a fiber to the premises in LaHarpe, KS and the surrounding rural area. The fiber to the premises build is complete and the citizens in the area have one of the most advanced systems in the nation with internet capability in the range of 100M/sec. Overbuilding with grant money could put repayment of our loan in jeopardy.

-----Service Area:  MT_Fergus

Submitter:  Triangle Telephone Cooperative

Comment:  Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of underserved under the ARRA. Triangle Telephone offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Triangle Telephone.

Submitter:  Mid-Rivers Communications

Comment:  As shown on our response map, major portions of the Applicant's Proposed Funded Service Area are NOT UNDERSERVED. Mid-Rivers Communications has provided and advertised broadband services of up to 10 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in the Lewistown, Montana, community since 2007. We currently provide broadband via cable modem in the Lewistown City Limits and via Fiber to the Premise (FTTP) facilities in surrounding subdivisions and rural areas. Mid-Rivers has been
designated by the Montana Public Service Commission as an Eligible Telecommunications Carrier (ETC) in the Lewistown Exchange, and to date we have deployed broadband to approximately 75% of the population of the Exchange. We continue extending the reach of these service on an annual basis as part of an on-going build-out plan. Lewistown is also currently a competitive broadband environment with at least two other providers offering services in the area. Broadband up to 12 Mbps / 2 Mbps is also available upon request in Lewistown, in addition to Business Internet and Ethernet services scalable up to 100 Mbps symmetrical. Mid-Rivers is the Incumbent Local Exchange provider in the Grass Range and Roy areas, providing speeds exceeding the NOFA broadband definition in both of these areas indicated on the response map today. In addition, Mid-Rivers was recently approved for a Rural Utilities Service (RUS) loan to build out FTTP facilities in many of our Incumbent areas including the Grass Range and Roy exchanges.

Submitter: Central Montana Communications

Comment: Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.

-----Service Area: NE_Logan

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA. One hundred percent of the customers to which Consolidated provides landline telephone service within the PFSA are broadband capable.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.
By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

-----Service Area: NE_Holt

Submitter: Three River Telco

Comment: Three River Telco currently provides Broadband service inside their certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a “Served” area. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 66% of households. Three River Telco offers an 8 Mbps service.

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband
service of 3 Megabits and greater to 100% of the residential households and businesses, and the present Broadband subscription take rate in this rural area is very near 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 32 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “unserved” or “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

----Service Area: WA_Yakima

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.
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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

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: Ellensburg Telephone Company

Comment: Ellensburg Telephone Company (“Ellensburg”) is responding to this Public Notice Filing regarding Satellite Broadband ARRA Application LLC’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is located in Yakima County, Washington. Ellensburg is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 97% of its service area as outlined in response area map in Yakima County, Washington. For the proposed funded service area which overlaps with Ellensburg’s incumbent service area, the applicant claims that a portion is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “underserved” is not true.

-----Service Area: CO_Yuma

Submitter: CenturyLink
Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Phillips County Communications dba PC Telcom

Comment: Phillips County Telephone Company (PCTC) is a small, progressive, cooperative Rural Local Exchange Carrier (RLEC) located in Holyoke, Colorado. PCTC and its subsidiaries, Phillips County Communications, LLC (PCC, LLC) and PC Telcorp, Inc. (Telcorp) provide broadband Internet access ranging from 512 kbps down to 3 Mbps down to the entire service area for PCTC as well as the neighboring rural communities of Fleming, Haxtun, Julesburg, and Ovid, Colorado. All three entities are doing business as PC Telcom. Overall, greater than sixty percent of PC Telcom’s customers subscribe to speeds of 768 kbps down or greater. PC Telcom is one of the largest employers in northeastern Colorado and projects increasing its staff at an annual rate of two percent.

In keeping with its long tradition of providing cutting-edge technologies and after substantial investments in network infrastructure and facilities, one hundred percent of PC Telcom’s customers can enjoy broadband access. PC Telcom utilizes a variety of broadband technologies, each tailored to
Specific local needs and geographical challenges. These include Fiber to the Premise (FTTP), DSL, cable modem and unlicensed wireless.

PC Telcom provides broadband and Ethernet services to most anchor tenants in the communities within its service areas. These entities include all secondary schools; all County Government offices; hospitals and other health care facilities; and large businesses. In addition to Internet access at broadband speeds, PC Telcom also provides state-of-the-art Ethernet services to business customers at affordable rates.

PC Telcom has been the technology leader in northeast Colorado for its one hundred plus years of existence and is looking forward to continuing its excellent customer service record. PC Telcom was one of the first broadband providers in northeast Colorado and now relies on 10 years of experience delivering services to difficult to serve areas that larger providers ignore. PC Telcom is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and support and local offices. It serves from a local perspective because PC Telcom’s owners, who are its customers, have a personal stake in the communities where they work and live.

-----Service Area: NE_Dixon

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.
Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is greater than 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----Service Area:  TX_Lamar

Submitter:  Blossom Telephone Company, Inc.

Comment:  Blossom Telephone Company, Inc.

OMB Control Number: 0660-0031

OMB Control Number: 0572-0142

Satellite Broadband, with corporate offices in Carlsbad, Cal. has incorrectly filed for ARRA funding for areas that include a significant portion of Blossom Telephone Company’s (Blossom) exchange area in Texas. Satellite Broadband in their TX Lamar filing has incorrectly identified the Blossom exchange area as underserved. Satellite Broadband is wrong in their assertion and blanket filing. Blossom is providing broadband speeds equal to or in excess of 768 kbps throughout is service territory. In addition, a significant portion of their exchange area also has highspeed broadband service being provided by a cable provider as well as at least one wireless service provider. It therefore would seem plain that Satellite Broadband did not perform due diligence in submitting it’s application for the Blossom service area. We also want to note that Blossom recently was approved for a RUS loan project specifically designed to construct a Fiber to the Home (FTTH) network in the Blossom exchange that will enable broadband speeds in excess of 5 Mbps.

We strongly oppose Satellite Broadband’s filing and their request for funds on the basis that they have incorrectly identified the service area of Blossom as underserved when Blossom is providing broadband
access at speeds equal to or greater than 768 bps throughout their exchange. We recommend that the Satellite Broadband application regarding Blossom Telephone Company in Texas be rejected.

If you have any questions, or need additional information please do not hesitate to contact us.

Sincerely,

Clint Dorries
Blossom Telephone Company, Inc.

-----Service Area:  MT_Garfield

Submitter:  Mid-Rivers Communications

Comment:  As shown on our response map, areas of Garfield County, Montana, including the community of Jordan, are NOT UNDERSERVED as the Applicant has indicated. Mid-Rivers Communications is the Incumbent Local Exchange provider in Jordan and the balance of Garfield County, which has one of the lowest population densities in the nation. We currently provide and advertise broadband speeds of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in Jordan, and broadband meeting or exceeding the NOFA definition in other areas of the County including Rock Springs, Sand Springs, and other areas indicated on the response map. We have been providing affordable, reliable wireline broadband to the schools, ambulance services, fire departments, and other vital community facilities in these areas for several years utilizing existing funding sources, and have plans to build Fiber to the Premise (FTTP) facilities in this Exchange in the future utilizing a recently-approved Rural Utilities Service (RUS) loan. Mid-Rivers has also applied for a BIP/BTOP grant to build FTTP services to truly UNSERVED customers in the Rock Springs Exchange in south Garfield County.

-----Service Area:  ID_Adams
Submitter: Cambridge Telephone Company

Comment: Cambridge Telephone has fiber to the node facilities that can deliver broadband speeds that far exceed the 3mbs requirement to fulfill an underserved area.

-----Service Area: NE_Wayne

Submitter: Pierce Telephone Company, Inc.

Comment: For the portion of this application that overlaps the Pierce Telephone Company, Inc. serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of households and 100% of businesses. Additionally, Pierce Telephone Company, Inc. offers 3Mbps, 8Mbps, 10Mbps, and 12Mbps service in this area. Lastly, Pierce Telephone Company, Inc. supplies broadband service to over 40% of the households in this area. Per the criteria defined for the stimulus program, this area is classified as served.

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is equal to 40% and growing.
Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----Service Area: CO_SanMiguel

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Qwest
Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband San Miguel for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

Submitter: Nucla-Naturita Telephone Co.

Comment: Nucla-Naturita Telephone Company, d.b.a. NNTC Wireless, has been providing high-quality communication services to the remote and mountainous areas of western Colorado for more than sixty years. We were among the first in the area to provide broadband service. In 2003, NNTC’s customers could access the Internet at 640 kbps, a speed at the time that rivaled metropolitan areas.

NNTC continually stays atop off technological trends offering its customers ever-increasing speeds. In 2006, customers were offered broadband service at speeds topping out at 3 Mbps.

NNTC operates in the Rocky Mountains and provides service to community anchor institutions including forest service offices and wildfire stations. Due to the extreme terrain, some remote areas were unable to receive broadband services over wireline facilities. In order to serve these residents and institutions, NNTC invested in wireless spectrum in 2005. Customers can now access wireless broadband services including 3G EVDO wireless access. NNTC is a local company, proudly serving the western slopes of the Rocky Mountains. It looks forward to the next 60 years, keeping this geographically remote area on the technological cutting edge.
Service Area: MT_GoldenValley

Submitter: Mid-Rivers Communications

Comment: As shown on our response map, many areas of Golden Valley County, Montana, including the communities of Lavina and Ryegate, are NOT UNDERSERVED as the Applicant has indicated. Mid-Rivers Communications is the Incumbent Local Exchange provider for the communities of Lavina and Ryegate and much of the balance of Golden Valley County, one of the least populated counties in the state. We currently provide and advertise broadband speeds of up to 5 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in both Lavina and Ryegate, and broadband of at least 768 Kbps downstream in other areas of the County indicated on the response map. We have been providing affordable, reliable wireline broadband to the schools, ambulance services, fire departments, and other vital community facilities in these areas for several years utilizing existing funding sources, and have future plans to build Fiber to the Premise (FTTP) facilities to this Exchange in the future utilizing a recently-approved Rural Utilities Service (RUS) loan.

-----Service Area: NE_Keith

Submitter: ATCJet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: ATC Communications

Comment: Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATC is capable of offering broadband service to all the households in its service territory.
Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant’s PFSA contains 3,707 households of which 282 households have access to broadband from Consolidated. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

-----Service Area: CO_Garfield

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the
application of Satellite Broadband Garfield for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: KS_Chautauqua

Submitter: Totah Communications, Inc.
Comment: Totah Communications, Inc.

Satellite Broadband (Sat) a satellite broadband provider, which is a non-terrestrial based service provider, has incorrectly filed for ARRA funding for an area that includes a portion of Totah Communications, Inc.’s (Totah) rural exchange area in Kansas. The area Sat proposes to serve that covers Totah territory is Niotaze. Sat has incorrectly identified the area as Unserved. Sat is wrong in their assertion. Niotaze is already being served with broadband by Totah (Incumbent ILEC) at speeds equal to or greater than 768 kbps. In addition, the area is also currently being served by at least one wireless provider.

We strongly oppose Sat’s filing and their request for funds covering Niotaze in Kansas on the basis that they have incorrectly identified the area as unserved and recommend that it be rejected on the grounds that the incumbent ILEC, Totah Communications, Inc. is already providing broadband access in this exchange.

If you have any questions, or need additional information please do not hesitate to contact us.

Sincerely,

Keith E. Watson
The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT’s owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.

Service Area: IA_Lyon

Premier Communications

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).

Northern Iowa Tel. Co. dba Premier Communications

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).
-----Service Area:  CO_Elbert

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC Elbert for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  CO_Weld

Submitter:  Roggen Telephone Enterprises, Inc.

Comment:  Roggen Telephone Cooperative Company and its affiliate Roggen Telephone Enterprises, Inc. (RTE) has been providing high-quality communications services to the residents of rural communities of northeastern Colorado for 75 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Building on its reputation for providing cutting-edge technologies to service areas that other larger providers ignore, RTE provides broadband services at speeds up to 3 Mbps to 100% of its service areas. RTE also provides service to rural neighboring communities within a 1200 square mile radius.

RTE is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service, technical support, and local offices. RTE provides needed broadband services to community anchor institutions including schools, local and state government offices and public safety agencies. Due to the geographical remoteness of the areas where RTE serves, academic studies, both at the secondary and university levels, are often online. Many of RTE’s customers rely on its broadband service, as well as its computer service and sales, for educational purposes.

RTE, along with its parent company, strives to provide superior communications services to our customers and communities. We look forward to a future, based on our past performance, of innovation and a commitment to excellence. We serve our customers with pride and respect, and, among our employees, have formed an enthusiastic team with the skills, abilities, and dedication that
make a positive difference in the communities we serve. Our customers rely on us to be a leader in the industry, providing a bridge to their communications future.

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Wiggins Telephone

Comment: Wiggins Telephone Association has an existing RUS approved in 2008 construction project design and $29.7 million loan in place to provide broadband access throughout the entire service area with Fiber to the Home. Portions of the Colorado counties of Adams, Logan, Morgan and Weld are included in the Wiggins Telephone Association service area.

Copper fed DSL is available in the Briggsdale, Grover and New Raymer communities subject to a limit of 18,000 feet from the central office pending construction of FTTH facilities. Additional construction is to be completed by the end of 2011 providing broadband access to all subscribers throughout the Wiggins Telephone Association service areas. All bandwidth packages offered to all areas are at FCC minimum (768 Kbps) and above.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Weld for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Ellis
Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: CA_Sierra

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.

-----Service Area: CO_Archuleta

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Service Area: OK_Wagoner

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects- Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum
broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Suddenlink Communications

Comment: This application, filed by a satellite provider of broadband services, proposes a multi-state funded service area (FSA), within which Suddenlink provides wireline broadband services. The sizable number of responses that Suddenlink needed to file as part of this overall process, and the 30-day window in which we were allowed to do so, prohibited us from mapping all Suddenlink-served areas within this particular, multi-state FSA. Accordingly, for the purposes of our response to this application, we have mapped one Suddenlink service area as an example of the company’s many service areas within the applicant’s proposed FSA. Suddenlink requests that the agency reviewing this response take special care to determine ALL of the served areas in the applicant’s FSA and restrict any awarded funds to the provision of broadband service in the unserved and underserved portions of the proposed FSA.

Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the “Existing Broadband Subscribers” section of this response; (3) a summary of the vendor and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers
through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: OR_Baker

Submitter: Oregon Telephone Corporation

Comment: Respondent provides broadband services to a portion of the Applicant's overlapping proposed funded service area indicated on the attached map.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Baker 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: AZ_Greenlee

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.

-----Service Area: ID_Blaine

Submitter: Cox Communications
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 least ten years. Cox provides its customers in Idaho 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.

-----Service Area: NE_Cuming

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

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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
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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.

-----Service Area:  KS_Cloud

Submitter:  Twin Valley Telephone, Inc.

Comment:  Twin Valley Telephone, Inc. ("TVT") is an Incumbent Local Exchange Carrier ("ILEC") that has provided communications services in north-central Kansas since 1947 and has participated in multiple RUS programs. With a state-of-the-art broadband network featuring fiber-to-the-premises ("FTTP") and ADSL2+ infrastructure, TVT has the ability to provide broadband services to 100% of the households and businesses within its 2400 square mile service territory. In approximately two-thirds of its territory, TVT can provide broadband service at speeds of up to 100 mbps to every household with its FTTP architecture. In the remaining one third of its territory, TVT can provide broadband service at speeds of at least 8 mbps and up to 25 mbps. TVT's broadband service has been enthusiastically embraced by its customers, and its rate of broadband subscribership is well in excess of 40%.

TVT does not believe that Satellite Broadband ARRA Application LLC’s ("Satellite Broadband") characterization of its proposed service area as both unserved and underserved is accurate. Although TVT is not privy to any of the underlying data upon which Satellite Broadband purports to demonstrate that the area is unserved/underserved, the information provided in this Response strongly suggests that the proposed service area is neither unserved nor underserved as those terms are defined in the Notice of Funding Availability ("NOFA") published in the July 9, 2009, Federal Register.
Submitter: Cunningham Communications

Comment: Cunningham Telephone Company, with its affiliate Cunningham Communications has been providing high-quality communications services to the residents of the rural communities of northwestern Kansas for more than 65 years. It was one of the first providers in this remote area to offer broadband services eleven years ago. Currently, almost 100% of Cunningham's service areas have broadband capability reaching speeds up to 10 Mbps.

In keeping with its long tradition of providing cutting-edge technologies, Cunningham has begun a Fiber To The Home (FTTH) project. Through this FTTH project, estimated to be completed in 2012, every customer in a majority of Cunningham’s service areas, even in the most remote rural areas, will have a direct fiber feed from their home and business to the world.

Cunningham is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Cunningham provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because Cunningham’s owners and employees have a personal stake in the communities where they work and live.

-----Service Area: MN_Sherburne

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications
found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: IA_Carroll

Submitter: BTC, Inc. dba Western Iowa Networks

Comment: Satellite Broadband ARRA Application LLC’s proposed project covers approximately 100% of the Carroll, IA exchange served by BTC, Inc. dba Western Iowa Networks. We currently serve the exchange by an existing Fiber-to-the-Home network that extends from our corporate headquarters in Breda, IA. In the public notice response BTC, Inc. is providing; 1) a map of the overlapping area BTC, Inc. provides broadband services, 2) BTC’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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Carroll 1for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NE_Madison

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.
-----Service Area: TX_Dallam

Submitter: XIT Rural Telephone Cooperative, Inc.

Comment: XIT Rural Telephone Cooperative, Inc. provides the town of Texline with 750 Kb ADSL, plus 1.5 Mbps download and 1.5 Mbps upload VDSL service. We currently provide ADSL and VDSL to over 50% of the residential households in Texline. Based on the NOFA definition of “unserved”, where at least 90 percent of households lack access to facilities-based, terrestrial broadband service at the minimum broadband transmission speed of 768 kbps downstream and 200 kbps upstream, the city of Texline is NOT “unserved”, as Satellite Broadband ARRA Application LLC as indicated.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: NE_Webster

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.
Submitter: Glenwood Telephone Membership Corporation

Comment: Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

-----Service Area: WY_Crook

Submitter: RT Communications

Comment: RT Communications, Inc (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Crook County and the towns of Moorcroft and Hulett. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout our serving territory. 80% of RT customers in this service area of Crook County including subscriber households and business locations are capable of receiving DSL speeds in excess of 768k/200k today. Approximately 38% of residential households subscribe today to DSL service in excess of 768k/200k transmission speeds. RT's parent company, Range Telephone also provides DSL service to the majority of Crook County in excess of 768k/200k speeds and have a residential subscribership of 47%. Based on combined residential broadband subscription of 85%, the applicant's proposed funded service area is not underserved.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) serving 2235 access lines in rural Northeastern Wyoming. Range service area includes Johnson, Crook, Weston, Campbell and Sheridan Counties. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 46% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Wyoming is not unserved or underserved as represented in the applicant’s proposal.
With respect to Satellite Broadband ARRA Application LLC’s application for broadband funds support in Crook County Wyoming, their comments that the areas are unserved or underserved are not true. The areas Range serves that were applied for in their application in Crook County are capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Crook County Wyoming. Range has 2 employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area:  KS_Smith

Submitter:   Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment:   Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

-----Service Area:  SD_Lawrence
**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Lawrence for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

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**Service Area:** MT_Wheatland

**Submitter:** Central Montana Communications

**Comment:** Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of unserved under the ARRA.

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**Service Area:** WA_Okanogan

**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.

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**Service Area:** TX_Erath

**Submitter:** CenturyLink
Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: TX_Wichita

Submitter: NTS Communications, Inc.

Comment: NTS Communications, Inc. currently provides Broadband Service greater than 3 mbps in the community of Wichita Falls, TX.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: IA_Sac

Submitter: Evertek, Inc

Comment: Evertek 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: 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 4 customers with the 3 meg service. The majority of our customers with high speed internet are currently using our 512 speed (90%), with a few others using 1024 (5%), 1536 (4%) and 3072 (1%).

-----**Service Area:** OR_Gilliam

**Submitter:** CenturyLink

**Comment:** The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

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The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  ID_Fremont

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.

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Residential:

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Commercial:

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

-----Service Area:  WY_HotSprings
Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as RTC, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: RT Communications

Comment: RT Communications, Inc. (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Hot Springs County and the communities of Kirby and Thermopolis. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade through our serving territory. 80% of RT customers in this service area including subscriber households and business locations are capable of receiving DSL speeds in excess of 768k downstream and 200k upstream. Approximately 38% of residential households subscribe to the DSL service that is in excess of 768k downstream and 200k upstream. Beginning in 2010, DSL speed of 10 mb or greater will be available to FTTH households and businesses. In addition, cable companies such as Bresnan Communications do offer broadband in excess of 768k downstream and 200k upstream to at least 10% of the service area. Given this additional service, this service area in neither unserved or underserved as shown in the applicant's proposal.
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.

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- 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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NE_Phelps

Submitter: ATCJet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: ATC Communications

Comment: Arapahoe Telephone Company (ATC Communications) provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATC is capable of offering broadband service to all the households in its service territory.
**Submitter:** Glenwood Telecommunications Inc.

**Comment:** Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

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**Submitter:** Glenwood Telephone Membership Corporation

**Comment:** Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

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**Service Area:** NE_Greeley

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**Submitter:** Nebraska Central Telephone Co.

**Comment:** The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 269 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

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**Submitter:** Hamilton.net, Inc.
Comment: Hamilton.net just began offering stationary unmetered broadband services using 3G 1XEVDO/Rev A in this location. Our brand name for this service is "GMAX". This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service.

-----Service Area: NE_Perkins

Submitter: Elsie Communications

Comment: Elsie Communications, Inc. (ECI) has been providing high-quality communications services to the residents of the rural community of Elsie, Nebraska for 103 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Currently, 100% of ECI’s service areas have broadband capability. Because of ECI’s advanced network it can meet the local geographical challenges providing important community anchor institutions including local government and public safety agencies with broadband services. This local presence also allows ECI to provide 24-7 customer service and support. Due to ECI’s entrepreneurial spirit and its dedication to its customers and through a substantial investment in advanced network facilities, the rural communities surrounding the village of Elsie, Nebraska enjoy the same level of service as offered in metropolitan areas.

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA. One hundred percent of the customers to which Consolidated provides landline telephone service within the PFSA are broadband capable, (170). Broadband stimulus funds can be used more effectively elsewhere.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is
not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

-----Service Area: WA_Mason

Submitter: Hood Canal Telephone Co., Inc.

Comment: Satellite Broadband Arra LLC. proposed service area includes several Census Blocks that Hood Canal Telephone Co. currently serves. Hood Canal Telephone Co. received a Community Connect Grant and loans from the RUS to provide broadband to rural Mason County, WA.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Mason for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Hartley

Submitter: XIT Rural Telephone Cooperative, Inc.

Comment: XIT Communications provides the town of Dalhart with 1.5 Mbps download and 1.5 Mbps upload VDSL service. We currently provide VDSL to over 60% of the residential households in Dalhart. Based on the NOFA definition of “unserved”, where at least 90 percent of households lack access to facilities-based, terrestrial broadband service at the minimum broadband transmission speed of 768 kbps downstream and 200 kbps upstream, the city of Dalhart is NOT “unserved”, as Satellite Broadband ARRA Application LLC as indicated.
Service Area: MT_Treasure

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 55% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Satellite Broadband ARRA Application LLC’s application for broadband funds support in Treasure County Montana, their comments that the areas are unserved or underserved are not true. We serve the majority of Treasure County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.
Range is very sensitive to its member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA Application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Treasure County. Range has 2 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area:  KS_Grant

Submitter:  United Telephone Association

Comment:  United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy.

Submitter:  Stelera Wireless, LLC
Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Ulysses will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

-----Service Area: TX_Hill

Submitter: Internet America, Inc.

Comment: Internet America currently provides access to high-speed Broadband Internet service to this Applicant’s proposed service area. As detailed in this response the Company believes the area should be re-categorized as served.

-----Service Area: NE_Brown

Submitter: Three River Telco

Comment: Three River Telco currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to be classified as a “Served” area. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 51% of households. Three River Telco offers an 8 Mbps service.

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers, three of which provide telephone and broadband service to the PFSA for which the applicant has applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool.
One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA.

The respondent is aware that Qwest, Internet Nebraska, NE Nebraska Telco, 3 Rivers Telco, and Cable Nebraska all provide broadband service within the applicant’s proposed PFSA.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of unserved, that 90 percent of households in the PFSA lack access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be unserved. This application should be rejected.

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and while
demand for Broadband service in this rural area has not reached the 40% target rate, we are confident that it will.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----Service Area:  KS_Harvey

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 least ten years. Cox provides its customers in Kansas 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: Moundridge Telephone Company

Comment: For the portion of this application that overlaps the Moundridge Telephone Company
serving area, broadband of at least 768kbps downstream and 200kbps upstream is accessible to 100% of
households and 100% of businesses. Additionally, Moundridge Telephone offers a 4Mbps downstream /
1 Mbps upstream service in this area. Lastly, Moundridge Telephone supplies broadband service to over
50% of the households in this area. Per the criteria defined for the stimulus program, this area is
classified as served.

Submitter: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data
technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative
services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of
our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to
all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout
our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities
for the future.
Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: KS_Sedgwick

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 least ten years. Cox provides its customers in Kansas 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: The Southern Kansas Telephone Co., Inc.

Comment: The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT’s owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.
-----Service Area: MO_Buchanan

Submitter: NPG CABLE INC.,

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below. These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

-----Service Area: TX_Brown

Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in Brown County, TX, an area covered by Satellite Broadband’s Brown County broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 3% of its potential subscribers. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. Central Texas’ provision and advertising of broadband service, coupled with the combined penetration rate of all broadband providers, should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

-----Service Area: SD_Dewey

Submitter: CRST Telephone Authority
Comment: CRST Telephone Authority demonstrates that it provides broadband service throughout Dewey County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 66% of households in CRST’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 CRST and 66% of the households in CRST’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.

-----Service Area: OR_Wheeler

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.
CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  IA_Pocahontas

Submitter:  Evertek, Inc

Comment:  Evertek 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: 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: 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 as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----Service Area: OR_Jefferson

Submitter: Community Broadband

Comment: This county is covered by our company as well as three other WISP’s, Yellow Knife, web4mixair and Printime

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Jefferson 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.
Service Area: NM_Otero

Submitter: Penasco Valley Telephone Cooperative Inc.

Comment: Penasco Valley Telephone Cooperative Inc. is providing an upload document that shows our internet speeds along with pricing. By viewing the NM Otero map you will notice that our ILEC area shaded in purple is the area that is served with high speed internet service. We can currently provide ADSL2+ internet to over 90% of the households in this area. The majority of our facilities are provided with the help of RUS loans and would require additional and redundant spending to fund this project.

Submitter: Mescalero Apache Telecom, Inc.

Comment: Mescalero Apache Telecom, Inc. offers 1.5 Mbps, 3 Mbps, 6 Mbps, 8 Mbps and 10 Mbps downstream DSL service to over 99.6% of our service area. We have over 41% of our households taking DSL. According to the NOFA, “underserved” is defined if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. Mescalero Apache Telecom, Inc. has demonstrated that we have met all three requirements and that our area is NOT “underserved”. We are also disappointed that Satellite Broadband did not consult with the sovereign Mescalero Apache Tribe before submitting for grant money to serve our reservation.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency
officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: PVT NetWorks, Inc.

Comment: PVT NetWorks, Inc. serves the majority of the NM Otero map that has been overlapped by Satellite Broadband ARRA Application LLC. We are currently offering high speed internet with 700 MHz service and also with cable modem service. PVT NetWorks, Inc. is offering packages up to 3.0 Mbps.

Submitter: Tularosa Basin Telephone Company

Comment: The Respondent has made major capital expenditures to enable the delivery of broadband services throughout its service area. Within the Applicant’s proposed funded Service Area the Respondent is capable of providing broadband services to 100% of its customers and advertises that
capability. 100% of Respondents customers are capable of receiving download speeds of at least 6.0 Mbps. Over 75% of Respondents customers are served via fiber-to-the-premise; the remaining 30% are provisioned with short copper loops.

-----Service Area: NM_Socorro

Submitter: Western New Mexico Telephone Company, Inc.

Comment: Respondent identifies locations within the Applicant’s service area that are not un-served or underserved.

-----Service Area: KS_Meade

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a
communications company to the residents of southwest Kansas – it is a important part of the local economy.

Submitter: FairPoint Broadband d/b/a FairPoint Communications

Comment: FairPoint Broadband d/b/a FairPoint Communications ("FairPoint") is responding to this Public Notice Filing regarding Satellite Broadband ARRA Application LLC’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is all of Meade County, Kansas. FairPoint is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 100% of its service area as outlined in response area map in Meade County, Kansas. For the proposed funded service area which overlaps with FairPoint’s incumbent service area, the applicant claims that it is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “underserved” is not true for two of the three criteria in the NOFA.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: ID_Caribou

Submitter: Silver Star Telephone Company, Inc.
Comment: Silver Star Telephone Company, Inc. dba Silver Star Communications has served the rural communities of Star Valley, Wyoming and surrounding areas for over 60 years. Silver Star is a leader in providing broadband services to rural America, offering High Speed Internet Services ranging from 256k/128k to 20M/5M within its service territory. Currently, Silver Star offers broadband services with speeds exceeding 768k downstream to over 95% of its service territory. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper infrastructure and via its wireless facilities. Silver Star’s broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star’s investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is considered a premier employer in the area and employs over 60 local residents. Silver Star is committed to enhancing rural residents’ quality of life. Evidence of that commitment can be seen in Silver Star’s community service projects, scholarship program and sustainability initiatives.

Submitter: Direct Communications Cable

Comment: Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6.0 Mbps download and 1.0 Mbps upload in certain service areas. It appears that Satellite Broadband ARRA’s application overlaps the company’s area of service that includes the community of Bancroft and Grace and DCC believes that this area of service is neither unserved or underserved in broadband services.

Submitter: ICS of Idaho, LLC dba Millennium Broadband

Comment: ICS of Idaho dba Millennium Broadband provides high speed Broadband Services to the Soda Springs, Idaho community via cable modem service, ranging in speeds up to 5M within 100% of its service area. Millennium has provided broadband services to the Soda Springs community since 2005. Currently, Millennium provides cable tv services to 749 rural customers, of which 178 subscribe to Millennium’s high speed data services. Millennium's high speed internet services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Millennium is constantly improving its facilities to better serve its customers, while maintaining the balance between affordability and value. Millennium’s investment in its facilities reaches beyond merely providing broadband services to its customers; Millennium employs local residents and is dedicated to quality, reliability and price.
Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ID_Power

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: Direct Communications Cable

Comment: Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain service areas. It appears that Satellite Broadband ARRA’s application overlaps the company’s area of service that includes the community of American Falls. DCC provides wireless broadband to the American Falls community with speeds up to 6mbps downstream and 1mbps upstream and believes that this area is neither unserved or underserved in broadband services.

-----Service Area: NE_Sheridan

Submitter: Consolidated Companies

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool.
One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA. One hundred percent of the customers to which Consolidated provides landline telephone service within the PFSA are broadband capable.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

-----Service Area:  OK_Ellis

Submitter:  Dobson Telephone Company

Comment:  This is our area.

Submitter:  Pioneer Telephone Cooperative

Comment:  Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

-----Service Area:  SD_Deuel
Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Deuel County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application and that the proposed funded Service Area is not unserved or underserved. As demonstrated, 100% of households in ITC’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 ITC; 100% of the households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is 5.1% of households. Monies are currently being expended to upgrade facilities to offer minimum 1.5Mbps and higher speeds to the entire service area.

-----Service Area: KS_Wallace

Submitter: S&T Telephone Cooperative Association

Comment: S&T Telephone Cooperative Assn. currently provides Broadband service in its certificated exchange areas. 100% of the households have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 30% of households. S&T Telephone Cooperative Assn. offers a 3 Mbps service. Therefore, S&T Telephone Cooperative Assn. service areas do not meet the ARRA NOFA classification of “Unserved”

-----Service Area: OK_Alfalfa

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area
applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

-----Service Area: ID_Idaho

Submitter: Citizens Telecommunications Company of Idaho

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

-----Service Area: ID_TwinFalls

Submitter: Safelink Internet

Comment: Twin Falls County is already served by 8+ last mile providers.

-----Service Area: KS_Barton
Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or unserved as defined in the NOFA.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: H&B Cable Service

Comment: H&B Cable Service provides broadband speeds of up to 6Mbps within the town of Claflin in Barton County, KS. These speeds are available to everyone and are subscribed to by 144 households/businesses.

Submitter: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.
Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

-----Service Area: MT_Yellowstone

**Submitter:** VIKING Broadband, Inc.

**Comment:** The communities of Huntley, Worden, and Ballantine in this proposed service area of Yellowstone County are, and have been, served with broadband service to 10MB by VIKING Broadband, Inc.

**Submitter:** Bresnan Communications

**Comment:** Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.
Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: Triangle Telephone Cooperative

Comment: Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of underserved under the ARRA. Triangle Telephone offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Triangle Telephone.

Submitter: Mid-Rivers Communications

Comment: As indicated on our response map, sections of the Applicant's Proposed Funded Service Area in Yellowstone County are NOT UNSERVED OR UNDERSERVED. Mid-Rivers Communications currently provides and advertises DSL speeds of up to 3 Mpbs DOWNSTREAM / 1 Mbps UPSTREAM in the community of Custer, and speeds exceeding the NOFA definition in the Shepherd/Acton area. Mid-Rivers is the Incumbent Local Exchange provider in these areas, and was recently approved for a Rural Utilities Service (RUS) loan for future Fiber to the Premise (FTTP) build out in this exchange. The Mid-Rivers middle mile Gigabit Ethernet fiber route also passes through this Applicant's Proposed Funded Service area as indicated on the response map.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.
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: 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 Kansas 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.

-----Service Area:  NE_York

Submitter:  Henderson Cooperative Telephone

Comment:  Henderson Cooperative Telephone, dba Mainstay Communications, currently provides service in its certificated exchange area that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of the households have access to Broadband service of at least 768/200 Kbps The current residential penetrate rate of Broadband service at a speed of 768/200 or higher for this application area is 59%. Henderson Cooperative Telephone offers a 5 Mbps Broadband service.

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: Hamilton.net, Inc.

Comment: All residents and businesses within this service area have had access to broadband DSL services for several years.

-----Service Area: NM_Lincoln

Submitter: Penasco Valley Telephone Cooperative Inc.

Comment: Penasco Valley Telephone Cooperative Inc. is providing an upload document that shows our internet speeds along with pricing. By viewing the NM Lincoln map you will notice that our ILEC area shaded in purple is the area that is served with high speed internet service. We can currently provide ADSL2+ internet to over 90% of the households in this area. The majority of our facilities have been installed with the help of RUS funding and it would be redundant spending to fund this project.

Submitter: ENMR Telephone Cooperative, Inc.

Comment: ENMR currently serves the northern half of Lincoln County with DSL as part of its telephone service area.

Submitter: Baja Broadband Operating Company LLC

Comment: Baja Broadband provides cable modem service in Lincoln County also including Ruidoso, Ruidoso Downs, Capitan, and Alto at speeds up to 10 Mbps. Other broadband providers include Windstream, which advertises speeds up to 12 Mbps.

Submitter: Windstream
Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Tularosa Basin Telephone Company

Comment: The Respondent has made major capital expenditures to enable the delivery of broadband services throughout its service area. Within the Applicant’s proposed funded Service Area the Respondent is capable of providing broadband services to 100% of its customers and advertises that
capability. 99% of Respondents customers are capable of receiving downloads speeds of at least 1.5 Mbps and 92% are capable of receiving download speeds of at least 6.0 Mbps.

-----Service Area: MT_Hill

Submitter: Triangle Telephone Cooperative

Comment: Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of unserved nor underserved under the ARRA. Triangle Telephone offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Triangle Telephone.

-----Service Area: TX_Ochiltree

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: TX_Robertson
**Submitter:** Texas Communications

**Comment:** Texas Communications provides high-Speed wireless Internet to the following counties in central Texas: Brazos, Robertson, Grimes, Burleson and Milam. The PNF in question would provide government funding to directly compete against our privately funded enterprise and increase competition in an already crowded marketplace.

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**Submitter:** CenturyLink

**Comment:** The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access
lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: TX_Mitchell

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Colorado City is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area: ND_Mountrail
Submitter: Reservation Telephone Cooperative

Comment: The applicant contends the Proposed Funded Service Area (Mountrail County), which overlays an RTC service area, is unserved/underserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is underserved/unserved and has concluded it is not. According to RTC’s analysis, 100 percent of the residential households in the drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. Of those households capable of being served, the broadband penetration rate is over 22 percent for the 3 Mbps service area drawn and 63% for the entire exchange overlap area. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps throughout the drawn service area, including in the area newspapers and magazines, direct mail and area radio stations.

RTC has or is also completed FTTH to portions of the area by the end of this year. Adding the capabilities of higher speeds, video services and expanding the area served with high quality FTTH capable of 1000 Mbps.

-----Service Area: NE_Arthur

Submitter: KeyArt Comm.

Comment: We are providing broadband service through our internet company lakemac.net to the customers in this area.

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.
The applicant’s PFSA contains 185 households of which 135 households or 73 percent have access to broadband from Consolidated. Therefore, the PFSA does not qualify as underserved based on the availability criterion. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

-----Service Area:  OK_Pottawatomie

Submitter:  Dobson Telephone Company

Comment:  Dobson Telephone Company challenges the application of Satellite Broadband ARRA Application LLC based on their declaration of the serving area being underserved.

Submitter:  Allegiance Communications, LLC

Comment:  Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers
through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects- Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”
Submitter: Pottawatomie Telephone Company

Comment: Pottawatomie Telephone Company through its subsidiary, Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Pottawatomie serves.

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: TX_Lynn

Submitter: Poka Lambro Telephone Cooperative, Inc.

Comment: Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

-----Service Area: MT_Jefferson
Submitter:  Bresnan Communications

Comment:  Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area

----Service Area:  MN_Norman
Submitter: Garden Valley Telephone Company

Comment: Garden Valley Telephone Company ("GVTC"), a small rural operator and Rural Utilities Service ("RUS") Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application, LLC ("Satellite BB") proposed funded service area in the county of Norman, MN. Satellite BB has proposed broadband service for this area and it is already served by GVTC.

Submitter: Twin Valley/Ulen Telephone, dba ACS

Comment: Twin Valley/Ulen Telephone, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

Submitter: Felton Telephone

Comment: Felton Telephone will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

-----Service Area: TX_Midland

Submitter: NTS Communications, Inc.

Comment: NTS Communications, Inc. currently provides Broadband Services greater than 3 mbps in the community of Midland, TX.

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: Suddenlink Communications

Comment: This application, filed by a satellite provider of broadband services, proposes a multi-state funded service area (FSA), within which Suddenlink provides wireline broadband services. The sizable number of responses that Suddenlink needed to file as part of this overall process, and the 30-day window in which we were allowed to do so, prohibited us from mapping all Suddenlink-served areas within this particular, multi-state FSA. Accordingly, for the purposes of our response to this application, we have mapped one Suddenlink service area as an example of the company’s many service areas within the applicant’s proposed FSA. Suddenlink requests that the agency reviewing this response take special care to determine ALL of the served areas in the applicant’s FSA and restrict any awarded funds to the provision of broadband service in the unserved and underserved portions of the proposed FSA.

Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the “Existing Broadband Subscribers” section of this response; (3) a summary of the vendor and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.

-----Service Area: NM_RioArriba

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an unserved area. Windstream offers facilities-based, terrestrial broadband service at advertised speeds of greater than 768 kbps downstream and 200 kbps upstream to some of the households within the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given
this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as unserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “unserved area” as follows: “Unserved area means a proposed funded service area, composed of one or more contiguous census blocks, where at least 90 percent of households in the proposed funded service area lack access to facilities-based, terrestrial broadband service, either fixed or mobile, at the minimum broadband transmission speed (set forth in the definition of broadband above). A household has access to broadband service if the household can readily subscribe to that service upon request.”

-----Service Area: TX_Taylor

Submitter: NTS Communications, Inc.

Comment: NTS Communications, Inc. currently provides Broadband Service greater than 3 mbps in the community of Abilene, TX.

-----Service Area: CO_Routt

Submitter: Dubois Telephone Exchange, Inc.

Comment: Dubois Telephone Exchange, Inc. (DTE) is a Independent Local Exchange Carrier (ILEC) serving 2,500 access lines in rural northwest and south-central WY, including the Fremont County communities of Dubois and Crowheart; and the Carbon County communities of Baggs, Dixon and Savery. DTE also serves subscribers in the rural Little Snake River valley area of northeastern Moffat and
northwestern Routt Counties in Colorado. DTE is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout its serving areas. 90-95% of DTE subscriber households and business locations in our serving area are capable of 3mb DSL today. 50% of DTE residential households in the applicant’s proposed funded service area already subscribe to 3mb or 1.5 mb service today. Beginning in 2010, DSL speeds 10mb or greater will be available to FTTH households and businesses. The applicant’s proposed funded service area that overlaps DTE’s service area in Routt County Colorado is not underserved as represented in the applicant’s proposal.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC Routt for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: AZ_Mohave

Submitter: South Central Utah Telephone Association

Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service in portions of Beaver, Garfield, Iron, Kane, Piute, Servier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant's characterization of its service area as being unserved and underserved is entirely without merit. Our company is able to offer data circuits to the Applicants service area with speeds from T-1 to Gb ethernet.

Submitter: Rio Virgin Telephone & Cablevision dba Reliance Co

Comment: Rio Virgin provides broadband service in 100% of the proposed funded service area that overlaps our Arizona customer base. Broadband is available with a minimum 3 Mbps download speed to 100% of our customer base.
Submitter: NPG Cable, Inc.

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below. These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband Douglas 1 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

Submitter: Qwest
Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC Denver for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Kent

Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: Kent County Texas is being labeled as an Underserved rural area. We challenge the position regarding Kent County Texas as an Underserved location.

As the Incumbent Local Exchange Carrier in this rural Texas County (see map), we provide landline and broadband service offerings throughout Kent County Texas. Equally as important these rural areas are sparsely populated and providing the services is not without challenge. The communities within Kent County Texas have broadband services readily available. Cap Rock Telephone Cooperative, Inc. will continue to invest in providing services to customers in rural Texas including Kent County Texas.

Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Kent county rural area. Competition exists with limited potential customers. Satellite service providers, cable broadband service providers and wireless broadband opportunities is available to a number of residential and businesses located in Kent County Texas. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: IA_Clarke

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's
application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: NV_Lincoln

Submitter: Lincoln County Telephone System Inc.

Comment: LCTS is the terrestrial incumbent service provider fully overlapping the service area of the applicant. LCTS contends that the service area is neither "Underserved" or "Unserved". More than 90% of households within the proposed "Unserved" service area have access to the defined minimum download speed. Oddly, the proposed "Unserved" area includes several of the most significant population centers served by LCTS in which all thresholds even for an "Underserved" designation are exceeded (Pioche, Caliente and Panaca). Furthermore, LCTS has utilized and is currently drawing from a RUS Broadband loan in deploying its FTTH platform to accommodate the robust levels of broadband connectivity that will be required in the future.

-----Service Area: OK_McIntosh

Submitter: Cross Telephone Company LLC

Comment: Cross Telephone Company LLC through its subsidiary, Cross Cable Television, Inc., has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cross Cable Television, Inc. also offers IPTV service to its subscribers within the exchanges Cross serves.

Submitter: Cross Wireless L.L.C.

Comment: Cross Wireless, LLC, has been offering broadband speed data service to its subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the wireless service area is served with high speed internet broadband service.
-----Service Area: MN_Wilkin

Submitter: Runestone Telephone Association

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the rural Tintah exchange in Wilken County that is currently served by Runestone Telephone Association. We currently serve the exchange by an existing fiber-to-the-home network. In the public notice response Runestone Telephone Association is providing; 1) a map of the overlapping area Runestone provides broadband services, 2) Runestone’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: Rothsay Telephone Co. Inc

Comment: The Rothsay Telephone Co. is currently plowing fiber optic cable to the house in order to provide virtually unlimited bandwidth in our service area.

Submitter: Red River Rural Telephone

Comment: Red River Rural Telephone demonstrates that it provides broadband service throughout Wilkin County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, over 50% of households in Red River’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 Red River; over 50% of the households in Red River’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; Red River 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.

-----Service Area: NM_Valencia

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, NM Valencia for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: OK_Johnston

Submitter: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving
service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: James Cable LLC

Comment: James Cable LLC provides 8Mb broadband service to the communities of Ravia and Tishomingo, Oklahoma.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point
terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area:  ND_Bottineau

Submitter:  SRT Communications Inc

Comment:  This applicant (Satellite Broadband ARRA Application LLC) has applied for Broadband Stimulus support in areas (Cities/Townships/Census Blocks identified below) in the SRT Communications Inc. service area that do not qualify as unserved or underserved. SRT Communications Inc. provides 4 Mbps and 8 Mbps broadband in those areas.

<table>
<thead>
<tr>
<th>County Sub</th>
<th>Population</th>
<th>Housing Units</th>
<th>Households</th>
<th>SRT Service Area (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antler Township</td>
<td>73</td>
<td>41</td>
<td>32</td>
<td>Y</td>
</tr>
<tr>
<td>Landa City</td>
<td>28</td>
<td>28</td>
<td>15</td>
<td>Y</td>
</tr>
<tr>
<td>Lansford City</td>
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</tr>
<tr>
<td>Maxbass City</td>
<td>91</td>
<td>70</td>
<td>45</td>
<td>Y</td>
</tr>
<tr>
<td>Newburg City</td>
<td>88</td>
<td>64</td>
<td>47</td>
<td>Y</td>
</tr>
<tr>
<td>Westhope City</td>
<td>533</td>
<td>268</td>
<td>228</td>
<td>Y</td>
</tr>
</tbody>
</table>

Total            | 876        | 499           | 392        |

Submitter:  Turtle Mountain Communications

Comment:  i. United Telecommunications service territory overlaps approximately 56% of the Satellite – Bottineau proposed funded service area (PFSA). The PFSA only serves 59% of an underserved area based on the NOFA deviation therefore does not qualify for funding. Also, United service
approximately 40% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, Unites service the entire overlap area with service that is advertised at 3 meg and has broadband penetration over 40%. Thus this are also does not meet the definition of underserved.

-----Service Area:  KS_Wabaunsee

Submitter:  Wamego Telecommunications Co, Inc.
Comment:  Wamego Telecommunications Company, Inc., provides Broadband service speeds up to 3.0Mb/s to all households and businesses within our local exchange area of service as shown on our service area map. This area is NOT an "underserved" area as defined by the federal government.

Submitter:  The Tri-County Telephone Association, Inc.
Comment:  The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT
communities. TCT, one of the largest employers in the area, provides assistance in business development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter: TC Wireless

Comment: TC Wireless, Inc, along with its parent company The Tri-County Telephone Association, Inc., has been providing communications services to rural Kansas for over 46 years. TC Wireless was formed in 2004 specifically to provide wireless broadband services to communities that larger companies ignored. TC Wireless is a pioneer in providing high-quality services over the 700 Mhz wireless spectrum. It acquired its licenses at auction in 2002, taking a chance on the unproven spectrum. It began providing services in this band as soon as equipment was available. To meet the specific needs of the communities it serves, TC Wireless has expanded its offerings to include the 900 MHz and 2.4 MHz bands.

By utilizing an array of licensed and unlicensed spectrum, TC Wireless achieved a task five years ago that some still say today is not possible – bringing high speed Internet access to rural and remote areas. It did this, at considerable cost, because, as a local company, TC Wireless’ owners, who are also its customers, have a personal stake in the communities where they work and live. As a result, TC Wireless is providing rural America with advanced, reliable communications service.

Submitter: Mercury Wireless, LLC

Comment: Mercury Wireless currently provides up to 3 mbps wireless Internet access to sections of the applicant’s proposed service area.

-----Service Area: IA_Madison

Submitter: Interstate 35 Telephone Company
**Comment:** Interstate 35 Telephone Company demonstrates that it provides broadband service throughout the Truro and St. Charles Areas which are encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in I 35’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 I 35; 100% of the households in I 35’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; I 35 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.

-----Service Area: OK_Haskell

**Submitter:** Cross Cable Television, Inc.

**Comment:** Cross Cable Television, Inc., has been offering broadband speed data service to its subscribers in Whitefield for over 3 years. It currently is constructing Stigler and Chocotah using RUS Broadband Loan funds. The area applied for by the ARRA applicant, which falls within Cross’s franchise boundaries, is served with high speed internet broadband service.

**Submitter:** Cross Telephone Company LLC

**Comment:** Cross Telephone Company LLC through its subsidiary, Cross Cable Television, Inc., has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cross Cable Television, Inc. also offers IPTV service to its subscribers within the exchanges Cross serves.

**Submitter:** Cross Wireless L.L.C.
Comment: Cross Wireless, LLC, has been offering broadband speed data service to its subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the wireless service area is served with high speed internet broadband service.

-----Service Area:  ND_Renville

Submitter: Reservation Telephone Cooperative

Comment: The applicant contends the Proposed Funded Service Area (Renville County), which overlays an RTC service area, is underserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is underserved and has concluded it is not. According to RTC’s analysis, over 100 percent of the residential households in the service area have access to broadband service, as defined in the NOFA, and are capable of being served. Of those households capable of being served, the broadband penetration rate is over 40 percent. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps throughout the service area, including in the area newspapers and magazines, direct mail and area radio stations.

RTC has or is also completed FTTH to portions of the area by the end of this year. Adding the capabilities of higher speeds, video services and expanding the area served with high quality FTTH capable of 1000 Mbps.

Submitter: SRT Communications Inc

Comment: The Applicant has applied for Broadband Stimulus support in areas (Cities/Townships/Census blocks) identified below in the SRT Communications Inc. service area that do not qualify as unserved or underserved. SRT Communications Inc. provides 4 Mbps and 8 Mbps service in those areas.

<table>
<thead>
<tr>
<th>County Sub</th>
<th>Population</th>
<th>Housing Units</th>
<th>Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glenburn City</td>
<td>286</td>
<td>141</td>
<td>120</td>
</tr>
<tr>
<td>Mohall City</td>
<td>119</td>
<td>70</td>
<td>54</td>
</tr>
</tbody>
</table>
Sherwood City  574  335  295
Tolley City   155  120  81

-----Service Area:  ID_Ada

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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: SD_Aurora

Submitter: Midstate Communications, Inc.

Comment: We currently serve this area and offer 3 mg broadband service.

Submitter: Santel Communications

Comment: Santel Communications demonstrates that it provides broadband service throughout Aurora County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.
As demonstrated, 100% of households in Santel’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 Santel; 100% of the households in Santel’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; Santel 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.

-----Service Area:  IA_Polk

Submitter:  Mediacom Communications Corporation

Comment:  The vast majority of households within applicant's proposed service area are currently served by at least two wireline broadband service providers, including Qwest and Mediacom, and a variety of wireless providers. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant's proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up 20 Mbps. Approval of this application would result in duplicative broadband services and a waste of taxpayer dollars.

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).

-----Service Area:  ND_Billings

Submitter:  Reservation Telephone Cooperative
**Comment:** The applicant contends that Billings County, ND in the Proposed Funded Service Area, which overlays an RTC service area, is unserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is unserved and has concluded it is not. According to RTC’s analysis, 100 percent of the residential households in its service area have access to broadband service, as defined in the NOFA, and are capable of being served. 33 percent of the households capable of being served by RTC subscribe to broadband service. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps in the service area, primarily through print media circulated in the service area. Most of this area is served by other carriers. RTC serves the Northwest corner of Billings County.

Response Area Map and Census Information

**Submitter:** Consolidated Telcom

**Comment:** Consolidated Telcom service territory overlaps approximately 24% of the Satellite Broadband Application LLC Billings proposed funded service area (PFSA). Satellite Broadband Application LLC designates this area as underserved. In the overlapping area, Consolidated service advertises 3 meg service.

-----Service Area: OK_Washita

**Submitter:** Cable One, Inc.

**Comment:** Satellite Broadband ARRA Application LLC Washita County, Cordell and Chanute, Oklahoma and surrounding areas.

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: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.
Submitter: Carnegie Telephone Company

Comment: Carnegie Telephone Company provides DSL to 100% of the Carnegie and Alfalfa exchanges at speeds of at least 3mbps. The subscribership of the areas is greater than 40% of the households.

Submitter: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.
The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area:  KS_Kingman

Submitter:  Haviland Telephone Co., Inc.

Comment:  Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Kingman County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes the towns of Nashville and Norwich and adjacent rural areas, and the rural area of St Leo.

Submitter:  KanOkla Networks

Comment:  KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout
our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

-----Service Area: IA_BuenaVista

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: Evertek, Inc

Comment: Evertek 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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, IA Buena Vista for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: MT_Custer

Submitter: Mid-Rivers Communications

Comment: As shown on our response map, certain areas of Custer County identified by the Applicant are NOT UNSERVED or UNDERSERVED as the Applicant has claimed. Mid-Rivers Communications
currently provides and advertises broadband services of up to 10 Mbps DOWNSTREAM / 1 Mbps UPSTREAM in the Miles City community (which is indicated on the Applicant’s map as underserved), in competition with at least one other provider. Broadband speeds of up to 12 Mbps / 2 Mbps are also provided upon request, in addition to Business Internet and Business Ethernet services scalable to symmetrical speeds of up to 100 Mbps. Several recent Fiber to the Premise (FTTP) build-outs in outlying subdivisions, including Highway 59 South and other areas surrounding Miles City indicated on the response map, have brought facilities with broadband speed potential greatly exceeding the NOFA definition to many residents and businesses. Speeds up to 10 Mbps DOWNSTREAM / 1 Mbps UPSTREAM are currently advertised in these FTTP areas. We also provide broadband of at least 768 Kbps downstream to other areas of Custer County including the Ismay community, and 1.5 Mbps DOWNSTREAM is available to the Kinsey area utilizing 700 MHz wireless spectrum. Additional FTTP build-out is planned for this area over the next several years, and we were recently approved for a Rural Utilities Service (RUS) loan that will help construct FTTP facilities to other areas of the County in future years.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 51% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Satellite Broadband ARRA Application LLC’s application for broadband funds support in Custer County Montana, their comments that the areas are unserved or underserved are not true. We serve a part of Custer County and it is capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.
Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA Application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Custer County. Range has 5 employees that already reside very near to that area and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area:  SD_Lincoln

Submitter:  DigitalBridge Communications Corp.

Comment:  DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (MidContinent) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 55-60% overlap of its coverage with the PFSA based on households served.

Submitter:  Knology, Inc.

Comment:  Knology is making existing services available to approximately 32% of areas designated as "Underserved" and to approximately 81 % of areas designated as "Unserved"in the Satellite Broadband proposed funded service area (PFSA) in Lincoln County, South Dakota. Satellite Broadband may not be meeting the definition of “Underserved” because Knology, along with other service providers, are likely providing existing broadband services to more than 40% of the households in the PFSA. Knology, along
with other service providers in the area, may also be making broadband service available to more than 50% of the PFSA. Furthermore, Knology is advertising broadband service exceeding 3 mbps in underserved areas of the Satellite Broadband proposed funded service area.

Areas designated as ‘Unserved’ in the Satellite Broadband’s Lincoln County PFSA also may not be eligible for ARRA funding because Knology is making existing high speed internet services and cable modem services available to approximately 81% of Satellite Broadband’s Lincoln County PFSA and Knology, along with other service providers are likely making broadband services available to more than 90% of areas designated as “Unserved.” Information regarding Knology’s subscriber penetration and plans for upgrade are provided in the comments section.

Submitter: HANSON COMMUNICATIONS

Comment: Ft. Randall Telephone Company (“Company”), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the area east of the community of Centerville, SD which covers a portion of the proposed funded service area (“Area”) since 1997 after purchasing it from Qwest Communications. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion that the area is either unserved or underserved. At no time did the Applicant contact us to determine the status of the area regarding broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 89% of our end users in this area and of those 100% all are above the NOFA defined broadband speeds for unserved areas.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Broadband Satellite Lincoln for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.
-----Service Area: UT_Summit

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, UT Summitt for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: IA_Monona

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Monona for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: TX_Wise

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.
Submitter: James Cable LLC

Comment: James Cable provides 8Mb Broadband service to the community of Decatur, Texas. We provide 3Mb service to the communities of Alvord, Bridgeport, Lake Bridgeport, Chico, and Runaway Bay, Texas.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: KS_Rooks

Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Rural Telephone Service Co., Inc., an RUS borrower since 1952, and our wholly owned subsidiary Nex-Tech, Inc., offer broadband service within the Proposed Funded Service Area as shown on the map. Portions of this area are underserved and/or served as defined in the NOFA.

-----Service Area: SD_Hamlin

Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Hamlin County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application and that the proposed funded Service Area is not unserved or underserved. As demonstrated, 100% of households in ITC'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 ITC; 100% of the households in ITC’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; ITC does not advertise broadband service at broadband transmission speeds of at least 3 megabits per second downstream.
throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is 2.1% of households. Monies are currently being expended to upgrade facilities to offer minimum 1.5Mbps and higher speeds to the entire service area.

-----Service Area: KS_Cheyenne

Submitter: Rural Telephone Service Co., Inc./Nex-Tech, Inc.

Comment: Nex-Tech, Inc., an RUS Broadband Loan borrower and wholly owned subsidiary of Rural Telephone Service Co., Inc., an RUS borrower since 1952, offers broadband service within the Proposed Funded Service Area as shown on the map. This area meets the definition of an underserved area as defined in the NOFA.

Submitter: BWTelcom

Comment: Benkelman, Wauneta and Hartman Telephone Companies, dba BWTelcom, currently provides service in its certificated exchange areas that meets or exceeds all ARRA NOFA requirements to classified as a "Served" area. 100% of households have access to Broadband service of at least 768/200 Kbps. The current residential take rate of Broadband service at a speed of at least 768/200 Kbps or greater is 48% of households. BWTelcom offers a 5 Mbps service.

-----Service Area: TX_Childress

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area

-----Service Area: TX_Motley
Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: Motley County Texas is being labeled as an Underserved rural area. We challenge the position regarding Motley County Texas as an Underserved location.

As the Incumbent Local Exchange Carrier in this rural Texas County (see map), we provide landline and broadband service offerings throughout Motley County Texas. Equally as important these rural areas are sparsely populated and providing these services are not without challenge. The communities within Motley County Texas (Roaring Springs, Flomot and Matador) have broadband services readily available.

Cap Rock Telephone Cooperative, Inc. is one broadband service provider in the Motley county rural area. Competition exists with limited potential customers. Satellite service providers, cable broadband service providers and wireless broadband opportunities are available to a number of residential and businesses customers located in Motley County Texas. Cap Rock Telephone Cooperative, Inc. will continue to invest in providing services to customers in rural Texas including Motley County Texas. Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: NE_Grant

Submitter: Consolidated Companies

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant’s PFSA contains 292 households of which 236 households or 81 percent have access to broadband from Consolidated. Therefore, the PFSA does not qualify as underserved based on the availability criterion. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.
The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

-----Service Area:  TX_Hunt

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.
This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: NE_Nuckolls

Submitter: Glenwood Telecommunications Inc.
**Comment:** Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

**Submitter:** Glenwood Telephone Membership Corporation

**Comment:** Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

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**Service Area:** SD_Spink

**Submitter:** Venture Communications Cooperative

**Comment:** Venture Communications Cooperative demonstrates that it provides broadband service throughout Spink County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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:** James Valley Cooperative Telephone Co & NVC

**Comment:** James Valley Cooperative Telephone Company and Northern Valley Communications, LLC demonstrate that they provides broadband service throughout Spink County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.
As demonstrated, 100% of households in JV & NVC’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 JV & NVC; 100% of the households in JV & NVC’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; JV & NVC 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.

-----Service Area: CA_Lassen

Submitter: Citizens Telecommunications Company of California

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

-----Service Area: WY_Natrona

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we've concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.
Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: RT Communications

Comment: RT Communications, Inc (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Natrona County and the town of Midwest. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout our serving territory. 80% of RT customers in this service area including subscriber households and business locations are capable of receiving DSL speeds in excess of 768k downstream and 200k upstream. Approximately 46% of residential households subscribe to the DSL service that is in excess of 768k downstream and 200k upstream. This service area is neither unserved or underserved as shown in the applicant's proposal.

-----Service Area: TX_Yoakum

Submitter: Poka Lambro Telephone Cooperative, Inc.

Comment: Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

-----Service Area: NM_Roosevelt
Submitter: ENMR Telephone Cooperative, Inc.

Comment: ENMR currently serves a portion of Roosevelt County with DSL as part of its telephone service area.

-----Service Area: KS_Gray

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is an important part of the local economy.

-----Service Area: MN_Chisago
Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ND_Dunn

Submitter: Reservation Telephone Cooperative

Comment: The applicant contends the Proposed Funded Service Area (Dunn County), which overlays an RTC service area, is unserved/underserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is underserved/unserved and has concluded it is not. According to RTC’s analysis, 100 percent of the residential households in the drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. Of those households capable of being served, the broadband penetration rate is over 66 percent for the 3 Mbps service area drawn and 66% for the entire exchange overlap area. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps throughout the service area, including in the area newspapers and magazines, direct mail and area radio stations.

RTC has or is also completed FTTH to portions of the area by the end of this year. Adding the capabilities of higher speeds, video services and expanding the area served with high quality FTTH capable of 1000 Mbps.
Submitter: Consolidated Telcom

Comment: Consolidated Telcom service territory overlaps approximately 84% of the Satellite Broadband Application LLC Dunn proposed funded service area (PFSA). Satellite Broadband Application LLC Bowman designates this area as unserved and underserved. In the overlapping area, Consolidated service advertises 20 meg service.

-----Service Area: ID_Minidoka

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: Safelink Internet

Comment: Minidoka County is already served by 5 last mile providers.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: WA_Pierce

Submitter: Yelm Telephone Company
Comment: Yelm Telephone Company (“Yelm”) is responding to this Public Notice Filing regarding Satellite Broadband ARRA Application LLC’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is located in Pierce County, Washington. Yelm is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 100% of its service area as outlined in response area map in Pierce County, Washington. For the proposed funded service area which overlaps with Yelm’s incumbent service area, the applicant claims that it is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “underserved” is not true. Further, the applicant did not designate at least 75% of the proposed funded service area as “unserved” or “underserved” and the applicant’s map for “underserved” portion of the proposed funded service area is not contiguous.

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.
CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: NE_Dakota

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: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this
Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is greater than 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----Service Area: UT_Sevier

Submitter: Central Telcom Services, LLC

Comment: Central Telcom Services, LLC dba CentraCom Interactive provides 5 mg high speed internet service, as well as video and voice services to communities throughout Sevier County, Utah.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, UT Sevier for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.
-----Service Area:  SD_Beadle

Submitter:  Venture Communications Cooperative

Comment:  Venture Communications Cooperative demonstrates that it provides broadband service throughout the Beadle County area which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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:  Santel Communications

Comment:  Santel Communications demonstrates that it provides broadband service throughout Beadle County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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.
-----Service Area:  SD_Miner

Submitter:  Santel Communications

Comment:  Santel Communications demonstrates that it provides broadband service throughout Miner County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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.

-----Service Area:  WY_Converse

Submitter:  James Cable LLC

Comment:  James Cable LLC provides 8Mg broadband service to the community of Douglas, WY. We provide 5 Mg service to the communities of Glenrock and Rolling Hills, WY.

-----Service Area:  NE_Butler
Submitter: Clarks Telecommunications Company

Comment: Clarks Telecommunications Company (CTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps CTC’s service area.

CTC was organized in 1908 and in 2007 was acquired by Northeast Nebraska Telephone Company (NNTC), a customer owned cooperative.

CTC is presently a borrower with the Rural Utilities Service and has been since 1957.

Within the PFSA overlap, CTC’s recently constructed buried fiber optics cable to the premise (FTTP) network provides access to Broadband services to 100% of the residential households and businesses, CTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and with this new buried FTTP network CTC anticipates the rate of subscription to be greater than 40% in a relatively short period of time.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTP Broadband capable network, and divert funding that could be available for unserved areas.

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.
Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and the present Broadband subscription take rate in this rural area is approaching 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----Service Area:  MN_Hubbard

Submitter:  Tekstar Communications, dba ACS

Comment:  Tekstar Communications, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above.  We will also provide the number of premises we reach and the number of customers we have on each speed tier.  We will map out the area we serve broadband within this applicant misstated application.

Submitter:  West Central Telephone Association

Comment:  West Central Telephone Association ("WCTA") a small rural operator and Rural Utilities Service Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application LLC ("Satellite BB") application for a portion of the Satellite BB proposed funded service area that falls within the boundaries of the WCTA telephone exchanges. Since incorporating in October of 1950, WCTA serving area has included portions of Becker, Cass, Hubbard, Ottertail, Todd and Wadena Counties ("service territories") with the majority of their service area in Wadena County.

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications
found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  CA_Sacramento

Submitter:  WaveDivision Holdings, LLC

Comment:  WaveDivision Holdings, LLC ("Wave") is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC ("Applicant") for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.

Submitter:  SureWest Communications

Comment:  Respondent disputes herein that some of the service area proposed for funding by Satellite Broadband ARRA Application LLC is neither underserved nor unserved. Putting aside the issue of other existing providers, for alleged unserved area, respondent shows that in the proposed funded service area, it currently advertises and provides fixed broadband service with transmission speeds of at least 768 kbps downstream and 200 kbps upstream, and that more than 10 percent of the households in the proposed funded service area currently have access to that service for alleged underserved area. Respondent also shows that in the proposed funded service area, 1) it currently advertises and provides fixed broadband service with transmission speeds of at least 3 mbps downstream, 2) that more than 50 percent of the households in the proposed funded service area currently have access to that service, and 3) that more than 40% of the households in the proposed funded service area currently subscribe to broadband service. The wireline broadband service providers in the area are AT&T, SureWest, and Comcast and various wireless broadband providers.
The applicant cuts a wide swath as specified above. In the Sacramento area applicant covers all CBGs that are neither un-served or underserved. The areas are Citrus Heights, Elk Grove, Fair Oaks, Florin, Folsom, Rancho Cordova, Rio Linda, Rosemont, and Sac City.

-----Service Area: CO_Cheyenne

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has
proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Eastern Slope Rural Telephone Association, Inc

Comment: Eastern Slope Rural Telephone Association, Inc. (ESRTA) has been providing high-quality communications services to rural eastern Colorado for 57 years. Based on our history of serving difficult-to-serve areas that larger providers ignore, ESRTA is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work. To this end, ESRTA is capable of providing broadband services at speeds exceeding 5 Mbps download.

ERSTA is a local company that provides much-needed jobs, 24-7 customer service and local offices. ERSTA is proud to count among its broadband customers community anchor institutions including schools, hospitals, local government offices and public safety agencies. It serves from a local perspective because ERSTA’s owners, who are also its customers, have a personal stake in the communities where they work and live.

-----Service Area: MO_Nodaway

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area: MO_Barton
Submitter: Craw-Kan Telephone Cooperative, Inc.

Comment: Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an unserved area. Windstream offers facilities-based, terrestrial broadband service at advertised speeds of greater than 768 kbps downstream and 200 kbps upstream to some of the households within the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as unserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “unserved area” as follows: “Unserved area means a proposed funded service area, composed of one or more contiguous census blocks, where at least 90 percent of households in the proposed funded service area lack access to facilities-based, terrestrial broadband service, either fixed or mobile, at the minimum broadband transmission speed (set forth in the definition of broadband above). A household has access to broadband service if the household can readily subscribe to that service upon request.”
Service Area: KS_Osage

Submitter: S&A Telephone Company

Comment: This grant proposes to bring satellite broadband internet service to all or parts of 20 states. The vast majority of the locations covered by this grant already have broadband today and this grant doesn’t pay the slightest bit of attention to the grant rules. It characterizes these areas as underserved when, in fact, a majority of the homes, businesses and anchor institutions within this footprint are already served with broadband today. This grant seems to assume that rural automatically means unserved and underserved, when in fact most of the proposed service area already has broadband.

For example, this grant request proposes to completely cover the service territory of S&A Telephone Company. S&A is an incumbent rural telephone company that has been serving this area for over 80 years. S&A has been granted a franchised area to serve, and since it has been willing to serve a very poor and rural area also has been given a federal exemption against competition. Small rural areas like the one served by S&A need a barrier against competition to ensure that people in the area can continue to get service for the next century. S&A has kept rates low and has brought advanced services and broadband to this rural area when nobody else was willing to make investments in such an impoverished area.

The S&A service territory is ‘served’ today using the definitions of the NOFA since the company has 1) more than a 40% broadband penetration, and 2) advertises broadband speeds of 3 Mbps.

Our knowledge of the telephone and cable industry tells us that this grant also proposes to bring broadband to many areas where AT&T, Qwest, various cable companies, and many other small telephone companies already provide broadband today.

This grant should be rejected in its entirety for not adhering to the grant guidelines for serving mostly unserved and underserved areas. We believe that the vast majority of residences and businesses covered by this proposed grant are ‘served’ with broadband using the definitions defined in the NOFA. This grant seems to think that rural equates to ‘underserved’ and ‘unserved’ as defined in the NOFA. This is not the case and the county seats, other towns and most census designated areas within these 33 counties already have broadband today and are not eligible for grant funding. The NOFA allows using only a small portion of any grant to cover served areas, but this grant seeks to use grant money to bring broadband mostly to places that are defined as ‘served’ under the NOFA. Again, this grant request should be rejected.

There are other problems with this grant. One issue with satellite broadband is the availability of upload speeds. Broadband as defined by the FCC has two components that must be met in order to qualify as broadband – download speed and upload speed. Most residential satellite service today does not qualify as broadband because of the paltry upload speeds available to customers. Many customers must use...
dial-up links over a telephone line to complete the upload link, and using the very slow speeds of dial-up disqualifies such a service from being considered as broadband. Even links directly from customers to the satellite are usually of dial-up type speeds. Good upload speeds are essential for a service to be considered as broadband. These grants have the goal of promoting economic development in rural areas. This means bringing broadband to rural businesses, but also bringing decent broadband to homes so that people can work from home. Over 80% of the new jobs created in the last decade have been created by small businesses, and a very large percentage of those new jobs have been created by people working out of their homes. Satellite broadband does not provide the kind of broadband that allows somebody to work from their home. People typically buy satellite broadband only when they have no alternative since the technology and service are inferior to all other types of broadband technologies.

Satellite broadband also has another significant drawback that limits its usefulness for economic development. All of the residential and small business satellite products available today place a monthly cap on the amount of total bandwidth that a customer can use. For example, a customer might be limited to 5 gigabits of total bandwidth for downloading and uploading combined. For anybody who does anything greater than reading emails and light web browsing, this bandwidth cap greatly reduces the possibility of using the satellite service for conducting business or working from the home.

Another problem with satellite broadband is the cost to customers. The typical residential satellite service today costs around $70 per month while having paltry upload speeds and a cap on monthly usage. Federal grant funds should not be used to promote this kind of expensive and inferior product.

Another problem with the grant is the amount of funding they are seeking. This grant request is asking for 75% grant funding. Under the most liberal interpretation of the NOFA grant rules, this grant would be at best eligible for 50% grant funding since it covers both non-remote areas and non-rural areas. However, since it proposes to bring broadband to many served areas it ought to be rejected and get no grant funding.

While this is an interesting proposal, this project should not be funded. This one project seeks to get a very large percentage of all of the available grant money, and would use this money to create an inferior broadband product. This technology is flawed. Customers in these states today already have satellite broadband available to them and federal grant funds should not be used to subsidize a second entry into a market that uses inferior technology and that charges too high a price for broadband.

Submitter: Mercury Wireless, LLC

Comment: Mercury Wireless currently provides up to 3 mbps wireless Internet access to sections of the applicant’s proposed service area.
----Service Area: TX_Reeves

Submitter: Big Bend Telephone Co.

Comment: Big Bend Telephone Company, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

----Service Area: TX_Concho

Submitter: Central Texas Telephone Cooperative, Inc.

Comment: Central Texas Telephone Cooperative, Inc. (Central Texas) is an incumbent broadband provider in Concho County, TX, an area covered by Satellite Broadband’s Concho County broadband stimulus application. Central Texas provides universal broadband coverage to 100% of its potential subscribers in the county, and it provides broadband service to 33% of those potential subscribers. Central Texas has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher. The combined penetration rate of Central Texas and all other incumbent broadband providers should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

----Service Area: OR_Lake

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.
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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.
The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

**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

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**Service Area:** MN_Clay

**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: Red River Rural Telephone

Comment: Red River Rural Telephone demonstrates that it provides broadband service throughout Clay County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, over 50% of households in Red River’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 Red River; over 50% of the households in Red River’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; Red River 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 subscribeship for the proposed funded Service Area is greater than 40 percent of households.
Submitter: City of Barnesville Telephone Utility

Comment: City of Barnesville Telephone Utility Company has been serving the rural area of Barnesville in Clay County Minnesota for over 108 years. Our company is the incumbent local exchange carrier in this area and by the NOFA definition of broadband, our area is neither unserved nor underserved. Due to the satisfaction of these definitions, we believe this application should be found invalid and no ARRA funds made available to the applicant in this area.

-----Service Area: OK_Texas

Submitter: Elkhart Telephone Co., Inc.

Comment: Elkhart Telephone Co., Inc. is an established rural telecommunications company that has been providing service since 1956. Elkhart Telephone, in conjunction with its affiliate, Epic Touch Co., provides a wide range of telecommunications services to consumers in Kansas and Oklahoma. Those services include local and long distance telephone service, wireless PCS service, cable television, and high speed Internet access. Satellite Broadband ARRA Application LLC’s proposed service area includes coverage of Elkhart Telephone’s entire service territory in rural Texas County, Oklahoma. Elkhart Telephone already provides “broadband” service, as that term is defined in the Notice of Funds Availability, in Texas County, Oklahoma. Accordingly, Satellite Broadband ARRA Application LLC’s application for broadband funding should not be granted.

-----Service Area: SD_Perkins

Submitter: West River Telephone Cooperative Company

Comment: West River Telephone Cooperative Company demonstrates that it provides broadband service throughout Perkins County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in West River’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 West River; 100% of the households in West River’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: Consolidated Telcom

Comment: Consolidated Telcom service territory overlaps approximately 17.5% of the Satellite – Perkins proposed funded service area (PFSA). Consolidated serves more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, Consolidated serves the entire overlap area with service that is advertized at 3 meg.

-----Service Area: CO_Montezuma

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has
proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Baja Broadband Operating Company LLC

Comment: Baja Broadband provides cable modem service in Cortez at speeds up to 10 Mbps. Other providers include Qwest which advertises DSL, wireless and satellite broadband options.

Submitter: Velocitynet LLC

Comment: VelocityNet, hereby, respectfully opposes and objects to this and all applications being considered for Broadband competitors applying for BIP or BTOP funding to expand into our existing rural markets of La Plata County and Montezuma County, Colorado.

These two counties are neither “unserved” nor “underserved” as defined by BIP and BTOP, and should not be eligible for any BIP or BTOP funding.

VelocityNet LLC has been providing and advertising 3Mb of high-speed broadband, wireless Internet services in Montezuma County and La Plata County in Colorado for over six years.

In addition to VelocityNet, there are six other Broadband companies, already providing and advertising high-speed, broadband services in Montezuma County Colorado.

Qwest provides DSL in Cortez, Durango & Mancos;
CenturyTel has DSL in Dolores, Lewis, and Arriola;
Baja has cable broadband in Cortez;
Farmers Telephone Company has broadband service in rural Montezuma County;

VelocityNet has grown, and prefers to grow, the old-fashion way...through hard-work and reinvesting profits... without relying on grants, loans or other outside financing. If BIP or BTOP provide grants and/or loans for the markets we serve, they would give an undeserved, “Government-funded financial advantage” to our competitors, and that would be completely unfair in our American free-market economy.
Therefore, as one of numerous incumbent broadband Internet service providers serving these two counties, we respectfully request that this and all existing and/or future applications for Montezuma County and La Plata County in Colorado be denied.

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to Cortez with peak speeds of 9-10 mbps in the next 6 months. The proposed service area will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: OK_Jackson

Submitter: Cable One, Inc.

Comment: Satellite Broadband ARRA Application LLC Jackson County, Altus, Oklahoma and surrounding areas.

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: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: NV_Lyon

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.

-----Service Area: ND_Foster

Submitter: Moore and Liberty, Griggs County Telephone

Comment: MLGC currently provides broadband service via DSL, with advertised speeds up to 3 Mbps, within the Applicant’s proposed service area. According to MLGC’s analysis of information it has as the incumbent service provider, 100 percent of the residential households in its drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. MLGC’s
subscriber penetration rate for broadband service is over 32 percent for the DSL service area drawn. Thus, MLGC satisfies two of the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because MLGC already meets these criteria, Applicant has erroneously claimed that the proposed service area is “underserved” or “unserved”. In addition to MLGC’s wireline services, MLGC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant’s proposed service area, with speeds of up to 2 Mbps.

The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution (“LTE”). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun. Verizon’s LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

Thus, MLGC already provides broadband services to the portions of Applicant’s proposed service area, and participates in the provision of mobile broadband services in that area as well.

MLGC continues to push DSL out further into its exchanges and is working on a FTTH plan for all of its areas bring broadband to all subscribers who want to subscribe.

Submitter:  Dakota Central Telecommunications

Comment:  Dakota Central Telecommunications demonstrates that it provides broadband service throughout Foster County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 95% of households in Dakota Central’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 Dakota Central; 95% of the households in Dakota Central’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; Dakota Central 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.
---Service Area: OK_Jefferson

**Submitter:** Pioneer Telephone Cooperative

**Comment:** Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer's broadband plant.

---Service Area: SD_Hyde

**Submitter:** Venture Communications Cooperative

**Comment:** Venture Communications Cooperative demonstrates that it provides broadband service throughout Hyde County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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.

---Service Area: CO_Chaffee
**Submitter:** South Park Telephone Company

**Comment:** South Park Telephone Company (SPTC) has been providing communications services in the remote and geographically isolated community of Hartsel, Colorado since 1996. SPTC was formed at the request of Hartsel residents after the much larger regional provider exited the service area in 1994. In order to drastically improve the antiquated facilities, SPTC made substantial investment in network upgrades and expansion of service so that all residents of Hartsell and the surrounding areas could access the same type of communication services as the rest of the country.

SPTC initially deployed broadband service to its subscribers in 2007 and has quickly geared up to now offer speeds of 1.0 Mbps to 100% of its service areas. Because of SPTC’s advanced network, important community anchor institutions including public safety agencies and the library now have broadband services. Due to SPTC’s entrepreneurial spirit, its dedication to its customers and through a substantial investment in advanced network facilities, the residents of Hartsel and surrounding areas of Park County now enjoy high-quality, 21st century service provided by a local company focused on their needs.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Chaffee for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** OK_Pontotoc

**Submitter:** Cable One, Inc.

**Comment:** Satellite Broadband ARRA Application LLC Pontotoc County, Ada, Oklahoma and surrounding areas.

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 advertise ments 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.
Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”
Submitter: Inter-Community Telephone Co.,

Comment: Inter-Community Telephone Co. provides Digital Subscriber Line (DSL) service in Barnes County, ND at speeds exceeding the NOFA definition of broadband; none of Barnes County, ND qualify as unserved per the NOFA. Satellite Broadband claims this area is unserved; however, ICTC knows this is not correct since we currently provide broadband service in this area.

The broadband service, at or above 768 kbps, is offered at every customer location in the cities of Nome, Fingal, Pillsbury, Sibley and Tower City in Barnes County and in the adjacent rural areas of these communities.

Submitter: Moore and Liberty, Griggs County Telephone

Comment: MLGC currently provides broadband service via DSL, with advertised speeds up to 3 Mbps, within the Applicant’s proposed service area. According to MLGC’s analysis of information it has as the incumbent service provider, 100 percent of the residential households in its drawn service area have access to broadband service, as defined in the NOFA, and are capable of being served. MLGC’s subscriber penetration rate for broadband service is over 33 percent for the DSL service area drawn. Thus, MLGC satisfies two of the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because MLGC already meets these criteria, Applicant has erroneously claimed that the proposed service area is “unserved”. In addition to MLGC’s wireline services, MLGC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant’s proposed service area, with speeds of up to 2 Mbps.

The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution (“LTE”). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun. Verizon’s LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

Thus, MLGC already provides broadband services to the portions of Applicant’s proposed service area, and participates in the provision of mobile broadband services in that area as well.

MLGC continues to push DSL out further into its exchanges and is working on a FTTH plan for all of its areas bring broadband to all subscribers who want to subscribe.
Submitter: Dakota Central Telecommunications

Comment: Dakota Central Telecommunications demonstrates that it provides broadband service throughout Barnes County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 95% of households in Dakota Central’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 Dakota Central; 95% of the households in Dakota Central’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; Dakota Central 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: Dickey Rural Networks

Comment: Dickey Rural Networks demonstrates that it provides broadband service within Barnes County, which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural’s service territory within the proposed funded Service Area are able to readily subscribe upon request to fiber broadband services with an advertised speed of 2 Mbps from Dickey Rural; 100% of the households in Dickey Rural’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; Dickey Rural 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.
-----Service Area:  MT_Meagher

Submitter:  Central Montana Communications

Comment:  Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of unserved under the ARRA.

-----Service Area:  KS_Chase

Submitter:  The Tri-County Telephone Association, Inc.

Comment:  The Tri-County Telephone Association, Inc. (TCT) has been providing high-quality communications services to rural Kansas for over 46 years. During this time, there has been much technological advancement, providing new services. TCT is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work.

In 2001, TCT proved this commitment by making substantial investment in upgrading its core facilities including digital switches and a fiber fed network. This cutting-edge technology allowed TCT to offer advanced communication services, including broadband access to 100% of its service areas. TCT, in looking toward the future, has embarked on a Fiber-To-The-Home (FTTH) project that, by the time it is complete in 2013, will connect every home and business in its service areas to fiber-speed bandwidth.

TCT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. TCT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because TCT’s owners, who are also its customers, have a personal stake in the communities where they work and live.

Recently, TCT committed to further serve our customers by creating the TCT Community Development Initiative. This initiative supports infrastructures to attract new residents and businesses to TCT communities. TCT, one of the largest employers in the area, provides assistance in business
development for both new and existing businesses. TCT will also acts as a liaison between local, state, and national economic development groups and contributes in local Community Development Groups.

Submitter: TC Wireless

Comment: TC Wireless, Inc, along with its parent company The Tri-County Telephone Association, Inc., has been providing communications services to rural Kansas for over 46 years. TC Wireless was formed in 2004 specifically to provide wireless broadband services to communities that larger companies ignored. TC Wireless is a pioneer in providing high-quality services over the 700 Mhz wireless spectrum. It acquired its licenses at auction in 2002, taking a chance on the unproven spectrum. It began providing services in this band as soon as equipment was available. To meet the specific needs of the communities it serves, TC Wireless has expanded its offerings to include the 900 MHz and 2.4 MHz bands.

By utilizing an array of licensed and unlicensed spectrum, TC Wireless achieved a task five years ago that some still say today is not possible – bringing high speed Internet access to rural and remote areas. It did this, at considerable cost, because, as a local company, TC Wireless’ owners, who are also its customers, have a personal stake in the communities where they work and live. As a result, TC Wireless is providing rural America with advanced, reliable communications service.

Submitter: Wheat State Telephone, Inc

Comment: Wheat State Telephone has been serving this rural community in south central Kansas for almost 60 years. Some of our service areas are in the heart of cattle country, yet we are committed to delivering high speed broadband service to all of our customers. Wheat State Telephone was the first provider of broadband service in the area as early as July, 2000. Since then we have continually upgraded our network to bring higher speeds to more and more of our subscribers. Wheat State Telephone continues to be a leader in broadband services. Based on the NOFA definition of broadband these communities are neither unserved nor underserved.

Wheat State Telephone is a community based company, with just under 50% of its staff being residents of the communities we serve. Our employees are active in the communities, volunteering with numerous events and serving on various local boards or committees.
Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: ND_Sargent

Submitter: RC Technologies

Comment: As illustrated on the map below, the proposed funded service area of the applicant, Satellite Broadband ARRA Application LLC, proposes to serve an area (Sargent, SD) currently served by RC Technologies (RCT). Within the 17 square mile area of overlap, RCT has the capability to provide broadband service via DSL with speeds of up to 1.5 Mbps down and 768 Kbps up to 100% of the households and businesses.

Submitter: Dickey Rural Networks

Comment: Dickey Rural Networks demonstrates that it provides broadband service throughout Sargent County, which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural’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 Dickey Rural; 100% of the households in Dickey Rural’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; Dickey Rural 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: Red River Rural Telephone

Comment: Red River Rural Telephone demonstrates that it provides broadband service within Sargent County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, over 50% of households in Red River’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 Red River; over 50% of the households in Red River’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 Red River advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area.

Service Area: KS_Cowley

Submitter: The Southern Kansas Telephone Co., Inc.

Comment: The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT’s owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.

Submitter: KanOkla Networks
Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

Submitter: Wheat State Telephone, Inc

Comment: Wheat State Telephone has been serving these two rural communities in south central Kansas for almost 60 years. Some of our service areas are in the heart of cattle country, yet we are committed to delivering high speed broadband service to all of our customers. Wheat State Telephone was the first provider of broadband service as early as July, 2000. Since then we have continually upgraded our network to bring higher speeds to more and more of our subscribers. Wheat State Telephone continues to be a leader in broadband services. Based on the NOFA definition of broadband these communities are neither unserved nor underserved.

Wheat State Telephone is a community based company, with just under 50% of its staff being residents of the communities we serve. Our employees are active in the communities, volunteering with numerous events and serving on various local boards or committees.

-----Service Area: WY_Lincoln

Submitter: Silver Star Telephone Company, Inc.

Comment: Silver Star Telephone Company, Inc. dba Silver Star Communications has served the rural communities of Star Valley, Wyoming and surrounding areas for over 60 years. Silver Star is a leader in providing broadband services to rural America, offering High Speed Internet Services ranging from 256k/128k to 20M/5M within its service territory. Currently, Silver Star offers broadband services with speeds exceeding 768k downstream to over 95% of its service territory. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper infrastructure and via its wireless facilities. Silver Star’s broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is
constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star’s investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is considered a premier employer in the area and employs over 60 local residents. Silver Star is committed to enhancing rural residents’ quality of life. Evidence of that commitment can be seen in Silver Star’s community service projects, scholarship program and sustainability initiatives.

Submitter: All West Communications

Comment: All West Communications provides broadband DSL and Ethernet services to Cokeville.

Submitter: Gold Star Communications, LLC

Comment: Gold Star Communications, LLC dba Silver Star Wireless (Silver Star) provides 3G Data Services via its EVDO network, ranging in speed up to 3.1Mb/s within at least 80% of its service area. Silver Star has provided mobile wireless carrier services to rural Wyoming and Idaho residents since 2004. Currently, Silver Star provides mobile voice services to over 3,700 rural customers; of those customers 265 subscribe to Silver Star’s high-speed data services, and at least 90% of the population within its service area has access to 3G Data Services. Silver Star’s wireless mobile 3G services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce while they’re on the move. Silver Star is constantly improving its facilities to better serve its customers, while maintaining the delicate balance between affordability and value. Silver Star’s commitment to its customers is evident in its dedication to quality, reliability and price.

-----Service Area: WY_Sheridan

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) serving 2235 access lines in rural Northeastern Wyoming. Range service area includes Johnson, Crook, Weston, Campbell and Sheridan Counties. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately
53% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Wyoming is not unserved or underserved as represented in the applicant’s proposal.

With respect to Satellite Broadband ARRA Application LLC’s application for broadband funds support in Sheridan County Wyoming, their comments that the areas are unserved or underserved are not true. The areas Range serves that were applied for in their application in Sheridan County are capable of 1.5 mb or higher broadband service to the households that we serve. The area we serve is very rural but we still are trying to meet our customer’s broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Satellite Broadband ARRA application LLC’s comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Sheridan CountyWyoming. Range has 4 employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.

-----Service Area: KS_Pottawatomie

Submitter: Wamego Telecommunications Co, Inc.

Comment: Wamego Telecommunications Company, Inc., provides Broadband service speeds up to 3.0Mb/s to all households and businesses within our local exchange area of service as shown on our service area map. This area is NOT an "underserved" area as defined by the federal government.
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 least ten years. Cox provides its customers in Kansas 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:** Blue Valley Tele-Communications, Inc.

**Comment:** Blue Valley Tele-Communications, Inc. (BVTC) is a rural telephone cooperative that has been serving these remote and rural communities for over 50 years. BVTC was one of the first companies in the nation to offer High-Speed DSL to both in-town and rural customers no matter the distance from the central office. BVTC is also building for future applications and higher demands for broadband by investing in a fiber to the premise network that will reach 100% of its customers in their telephone exchanges, and was one of the first companies in the nation to attempt this type of network.

As a cooperative, BVTC services are driven by customer need and demand and customers are represented by a Board of Directors to make sure those needs are being met. The company also employs a full-time economic development director to assist in growth of their service areas. BVTC is proud to be known as an industry leader in the broadband arena, and plans to continue leading the way in broadband development in the future.

-----**Service Area:** ND_Pembina

**Submitter:** United Telephone

**Comment:** United Telecommunications service territory overlaps approximately 18% of the Satellite – Pembina proposed funded service area (PFSA). United service more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, United service the entire overlap area with service that is advertized at 3 meg.

-----**Service Area:** WY_Niobrara
Submitter: James Cable LLC

Comment: James Cable provides 3 Mb service to the community of Lusk, Wyoming.

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area: OR_Crook

Submitter: Community Broadband

Comment: WE supply this area with multiple towers and high speed bandwidth. THere are 3 other wireless entities that also supply this area. Web4Mix, YellowKnife and Prinetime.

-----Service Area: CO_Teller

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable provides high speed internet service in

-----Service Area: UT_Kane

Submitter: South Central Utah Telephone Association
Comment: South Central Utah Telephone Association ("SCUTA") is a not for profit corporation that provides local telephone exchange, broadband, long distance, cable television and wireless PCS service in portions of Beaver, Garfield, Iron, Kane, Piute, Sevier, Washington and Wayne counties in south central Utah. In Arizona, SCUTA provides these services in the northern portion of Coconino and Mohave counties, north of the Grand Canyon. The Applicant's characterization of Kane county, Utah as being unserved and underserved is entirely without merit. In 2007, we engaged an independent market research firm to determine, among other things, broadband adoption rates in the St. George, Utah BTA, which includes all of Beaver, Garfield, Iron, Kane and Washington counties. It was determined with a 95% Confidence Level and a Confidence Interval of +/- 5% that Broadband adoption in the St. George BTA was 56%. Clearly the area is neither unserved nor underserved.

Submitter: Xpressweb Internet Services, Inc.

Comment: There are several areas in this application that overlap our coverage area. The applicant has designated some of these areas as "unserved" which is certainly not the case. These include Orderville, Utah, Glendale, Utah, Mt. Carmel, Utah, and Alton, Utah. We provide service in all of these areas. Additionally, the applicant has designated Kanab, Utah as being "underserved", which also is not the case. We currently provide greater than 3 Mbps service in the proposed coverage area. Another local ISP also provides services in excess of 3 Mbps.

-----Service Area: MN_RedLake

Submitter: Garden Valley Telephone Company

Comment: Garden Valley Telephone Company ("GVTC"), a small rural operator and Rural Utilities Service ("RUS") Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application, LLC ("Satellite BB") proposed funded service area in the county of Red Lake, MN. Satellite BB has proposed broadband service for this area and it is already served by GVTC.

-----Service Area: IA_Ida

Submitter: Evertek, Inc
Comment: Evertek 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: 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 1 customer with the 3 meg service. The majority of our customers with high speed internet are currently using our 512 speed (94%), with a few others using 1024 (3%), 1536 (1.5%) and 3072 (1.5%).

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, Ida, IA for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

------Service Area: TX_Montague

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.
Submitter: James Cable LLC.

Comment: James Cable provides 8Mb broadband service to the community of Bowie, Texas.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: CO_Mineral

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.
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 least ten years. Cox provides its customers in Kansas 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: Haviland Telephone Co., Inc.

Comment: Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Sumner County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes the towns of Conway Springs and Argonia and adjacent rural areas, and rural areas of the telephone exchange areas of Norwich and Riverdale.

Submitter: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.

Submitter: The Southern Kansas Telephone Co., Inc.

Comment: The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive
manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT’s owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.

-----Service Area: NE_Loup

Submitter: Consolidated Companies Inc.

Comment: Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA. One hundred percent of the customers to which Consolidated provides landline telephone service within the PFSA are broadband capable.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.
Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.

The respondent’s overlap area of applicant’s PFSA contains 270 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

-----Service Area: NE_ScottsBluff

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area: NE_Sarpy

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 least ten years. Cox provides its customers in Nebraska 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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Broadband Satellite Sarpy for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: CO_Prowers

Submitter: CenturyLink

Comment: CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline
and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Lamar is served by Stelera Broadband, a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area: TX_Wilbarger

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: KS_Lincoln

Submitter: Twin Valley Telephon, Inc.

Comment: Twin Valley Telephone, Inc. (“TVT”) is an Incumbent Local Exchange Carrier (“ILEC”) that has provided communications services in north-central Kansas since 1947 and has participated in multiple RUS programs. With a state-of-the-art broadband network featuring fiber-to-the-premises (“FTTP”) and ADSL2+ infrastructure, TVT has the ability to provide broadband services to 100% of the households and businesses within its 2400 square mile service territory. In approximately two-thirds of its territory, TVT can provide broadband service at speeds of up to 100 mbps to every household with its FTTP architecture. In the remaining one third of its territory, TVT can provide broadband service at speeds of
at least 8 mbps and up to 25 mbps. TVT’s broadband service has been enthusiastically embraced by its customers, and its rate of broadband subscribership is well in excess of 40%.

TVT does not believe that Satellite Broadband ARRA Application LLC’s (“Satellite Broadband”) characterization of its proposed service area as partly unserved and partly underserved is accurate. Although TVT is not privy to any of the underlying data upon which Satellite Broadband purports to demonstrate that the area is unserved/underserved, the information provided in this Response strongly suggests that the proposed service area is neither unserved nor underserved as those terms are defined in the Notice of Funding Availability (“NOFA”) published in the July 9, 2009, Federal Register.

Submitter: Wilson Telephone Co Inc dba Wilson Communications

Comment: Wilson Communications has been providing high quality and leading technology telecommunications services to rural Kansans for more than sixty years. Wilson Communications began offering high speed internet access service to our customers in the late 1990’s. We continued to expand our fiber network and now can provide broadband services to 100% of our customers. Wilson Communications continues to make investments in fiber optic facilities to ensure our customers have access to the latest broadband technology. We provide broadband to critical community anchor institutions including schools, rural health clinics, and public libraries. We are a full service provider of communications services and are able to bundle services offering discounts to our customers. Wilson Communications is a community based company, providing volunteerism, and other forms of support to each of the seven communities we serve.

Submitter: Cunningham Communications

Comment: Cunningham Telephone Company, with its affiliate Cunningham Communications has been providing high-quality communications services to the residents of the rural communities of northwestern Kansas for more than 65 years. It was one of the first providers in this remote area to offer broadband services eleven years ago. Currently, almost 100% of Cunningham’s service areas have broadband capability reaching speeds up to 10 Mbps.

In keeping with its long tradition of providing cutting-edge technologies, Cunningham has begun a Fiber To The Home (FTTH) project. Through this FTTH project, estimated to be completed in 2012, every customer in a majority of Cunningham’s service areas, even in the most remote rural areas, will have a direct fiber feed from their home and business to the world.
Cunningham is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Cunningham provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because Cunningham’s owners and employees have a personal stake in the communities where they work and live.

-----Service Area: WY_Laramie

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.
Submitter: RT Communications

Comment: RT Communications, Inc (RT) is a 13,923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including Laramie County and the towns of Albin, Burns, Carpenter, and Pine Bluffs. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout our serving territory. 80% of RT customers in this service area including subscriber households and business locations are capable of receiving DSL speeds in excess of 768k downstream and 200k upstream. Approximately 44% of residential households subscribe to the DSL service that is in excess of 768k downstream and 200k upstream. This service area is neither unserved or underserved as shown in the applicant's proposal.

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area: MN_Benton

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Benton Cooperative Telephone Company

Comment: Satellite Broadband ARRA Application LLC is proposing to overlap Benton Cooperative’s service areas of Rice, Bock, Foreston and Gilman. These areas are currently capable of receiving high speed broadband access at speeds ranging from 768k to 5.0M down through Benton’s fiber network. As such, these areas are “SERVED” based on the definitions as established in the Notice of Funds Availability (NOFA). In the public notice response Benton is providing: 1) a map of the overlapping area Benton provides broadband services, 2) Benton’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:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: SD_Sanborn

**Submitter:** Santel Communications

**Comment:** Santel Communications demonstrates that it provides broadband service throughout Sanborn County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 80% of households in Santel’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 Santel; 80% of the households in Santel’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; Santel 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.

-----Service Area: WA_Spokane
**Submitter:** CenturyLink

**Comment:** The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our
average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  OK_Tulsa

Submitter:  Cimmaron Telephone Co.

Comment:  Cimarron Telephone Company through its subsidiary Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Cimarron Telephone Company serves.

Submitter:  Cox Communications

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 least ten years. Cox provides its customers in Oklahoma 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.

-----Service Area: MT_Pondera

Submitter: 3 Rivers Telephone Cooperative, Inc.

Comment: This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive
existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----Service Area:  SD_Custer

Submitter:  HANSON COMMUNICATIONS

Comment:  Mt. Rushmore/Ft. Randall Telephone Company (“Company”), a wholly owned subsidiary of Hanson Communications, Inc., has been providing telecommunications service to the community of Hermosa, Fairburn and areas South of Keystone, SD and covers a portion of the proposed funded service area (“Area”) going back to 1982. In 2004, the Company began providing broadband service to the communities and the surrounding area.

We disagree with the Applicant’s assertion that the area is either unserved or underserved. At no time did the Applicant contact us to determine the status of the area regarding broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company is capable of providing broadband service to 97% of our end users in this area and of those 90% all are above the NOFA defined broadband speeds for unserved areas.

-----Service Area:  NE_Sherman

Submitter:  Nebraska Central Telephone Co.

Comment:  The respondent (Nebraska Central Telephone Company) is a Local Exchange Carrier (Common Carrier) that offers facilities-based, terrestrial Broadband (high speed) Internet access service in the overlap area of the PFSA.
The respondent’s overlap area of applicant’s PFSA contains 661 households. Respondent provides Broadband Internet access service (as defined in the NOFA) exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. Therefore, the PFSA does not qualify as “underserved” based on the availability criterion.

In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

-----Service Area:  WA_Lewis

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our
data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: The Toledo Telephone Co., Inc.

Comment: This application asserts that broadband is not available in this Service Area. Our company has provided broadband since 2001 and currently offers broadband with download speeds of at least 5 Mbs to 100% of the subscribers within our service area. Zip codes within our ability to provide wireline broadband are 98591, 98596, 98611, 98570.
-----Service Area: NE_Sioux

Submitter: WinDBreak Cable

Comment: Harrison NE in Sioux County, NE is serviced by 3 broadband service providers. WinDBreak Cable provides broadband service with broadband transmission speeds of at least 3 Mbps downstream.

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area: WA_Chelan

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.

-----Service Area: NE_Saunders

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.
NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is greater than 40%.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

-----Service Area:  ID_BearLake

Submitter:  Direct Communications - Rockland

Comment:  Direct Communications-Rockland is capable of providing broadband at speeds up to 1.5 mbps downstream and 512kbps upstream to 90% of its customers in its local exchanges of Arbon, Rockland and Paris, Idaho. DCR is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain areas of its Paris exchange. It appears that Satellite Broadband ARRA's application overlaps the company's Paris local exchange service area that includes the communities of Bloomington, Paris and St. Charles and DCR believes that its local service area is neither unserved or underserved in broadband services.

Submitter:  Direct Communications Cable
**Comment:** Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6.0 Mbps download and 1.0 Mbps upload in certain service areas. It appears that Satellite Broadband ARRA’s application overlaps the company's area of service that includes the community of Bloomington, Georgetown, Montpelier, Paris, St. Charles, and Fish Haven and DCC believes that this area of service is neither unserved or underserved in broadband services.

-----Service Area: NE_Blaine

**Submitter:** Consolidated Companies Inc.

**Comment:** Consolidated Companies is the parent company of four rural local exchange carriers providing telephone and broadband service to many of the PFSAs for which the applicant applied for broadband funding. Consolidated Companies’ response polygon has been input to the mapping tool. One hundred percent of the households within the response polygon have access to broadband as defined in the NOFA.

The applicant’s PFSA contains 238 households of which 189 households or 79 percent have access to broadband from Consolidated. Therefore, the PFSA does not qualify as underserved based on the availability criterion. The respondent provides, and advertises the availability of 3Mbps broadband service within the PFSA, so the PFSA does not qualify as underserved based on the 3Mbps criterion.

The third qualifying criterion for underserved areas requires the use of company specific market data, and is addressed in the Proprietary Comments section.

As the applicant proposal is wireless (satellite) the proposed broadband service will be subject to rain fade, line of sight and other limitations inherent to wireless systems.

By the portion of the NOFA definition of underserved, that no more than 50 percent of households in the PFSA have access to facilities based, terrestrial broadband service, the granting of this application would do nothing to change that status of this application as the applicant proposes satellite, which is
not terrestrial based broadband. The applicant’s PFSAs would still be underserved. This application should be rejected.

-----Service Area:  CO_Larimer

Submitter:  Baja Broadband Operating Company LLC

Comment:  Baja Broadband provides cable modem service in Estes Park and parts of Larimer County at speeds up to 10 Mbps. Other providers include Qwest (DSL), Airbits, and Estes Valley Networks.

Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband Larimer2 for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area:  MN_OtterTail

Submitter:  Park Region Mutual Telephone Company

Comment:  The applicant incorrectly claims the area served by our company as unserved and underserved. 100% of the establishments in our serving territory have access to facilities-based, terrestrial 3Mb plus internet. The rate of broadband subscribership is 41%. Moreover, the area is served by 2 other broadband providers (wireless and cable). This does not include cellular or satellite offerings.
Submitter: Tekstar Communications, dba ACS

Comment: Tekstar Communications, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

Submitter: Midwest Telephone Company, dba ACS

Comment: Midwest Telephone, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

Submitter: East Otter Tail Telephone, dba ACS

Comment: East Otter Tail Telephone, dba ACS will provide the advertising that was published in the local area verifying the speed of 3Mb and above. We will also provide the number of premises we reach and the number of customers we have on each speed tier. We will map out the area we serve broadband within this applicant misstated application.

Submitter: West Central Telephone Association

Comment: West Central Telephone Association ("WCTA") a small rural operator and Rural Utilities Service Title II borrower, respectfully requests relief and seeks withdrawal of the Satellite Broadband ARRA Application LLC ("Satellite BB") application for a portion of the Satellite BB proposed funded service area that falls within the boundaries of the WCTA telephone exchanges. Since incorporating in October of 1950, WCTA serving area has included portions of Becker, Cass, Hubbard, Ottertail, Todd and Wadena Counties ("service territories") with the majority of their service area in Wadena County.

Submitter: Rothsay Telephone Co. Inc.
**Comment:** The Rothsay Telephone Co. is currently plowing fiber optic cable to the house in order to provide virtually unlimited bandwidth in our service area.

**Submitter:** Otter Tail Telcom

**Comment:** The applicant incorrectly claims the area served by our company as underserved. 100% of the establishments in outlined territory in the map have access to facilities-based, terrestrial 3Mb plus internet. The rate of broadband subscribership of our customer base is 45%. Moreover, the area is served by more than 4 other broadband providers utilizing cable, wireline, and wireless. This does not include cellular or satellite offerings.

-----Service Area: UT_Wayne

**Submitter:** Wirelessbeehive.com LLC

**Comment:** This area is current not underserved. Wirelessbeehive.com serves this area with high speed internet.

-----Service Area: OK_Custer

**Submitter:** Dobson Telephone Company

**Comment:** Dobson Telephone Company challenges the application of Satellite Broadband ARRA Application LLC based on their declaration of the serving area being underserved.

**Submitter:** Cable One, Inc.

**Comment:** Satellite Broadband ARRA Application LLC Custer County, Clinton, Oklahoma and surrounding areas.
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: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. PLDI also offers IPTV service to its subscribers in the towns using the Pioneer’s broadband plant.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream's broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects-Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile
broadband service provider advertises broadband transmission speeds of at least three megabits per second ("mbps") downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Dobson telephone Company

Comment: This is our service area

------Service Area: MO_DeKalb

Submitter: NPG Cable, Inc.

Comment: NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.
Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (‘’mbps’’) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

-----Service Area: KS_Brown

Submitter: Rainbow Communications

Comment: Rainbow Telecommunications Association, Inc. dba Rainbow Communications is a phone, Internet, and cable TV service provider in rural northeast Kansas. The telecommunications company is headquartered in Everest, Kansas, and has been in existence since 1952. While Rainbow Telecommunications has offered high speed DSL- Internet for many years, the company has since expanded its service offerings in 2006 through a CLEC operation, Carson Communications dba Rainbow Communications. Rainbow Communications is able to provide high speed DSL, cable modem, and fiber-based Internet in many northeast Kansas rural communities. It is our goal to provide communication technology which rivals or surpasses those available in metro areas.
Submitter: JBN Telephone Company Inc.

Comment: JBN Telephone Company Inc. currently provides Broadband service in its certificated exchange areas. Over 50% of the households in the town and rural serving areas have access to Broadband service at a rate of 768/200 Kbps or higher. The current residential take rate of Broadband services in the application area at a speed of 768/200 Kbps or higher is 8% of households. JBN Telephone Company Inc. offers a 1.5 Mbps service. Therefore, JBN Telephone Company Inc. exchange areas are not “Unserved” as defined by the ARRA NOFA.

-----Service Area: TX_Cooke

Submitter: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

Submitter: Nortex Communications

Comment: Nortex Communications is disputing that its service area is unserved or underserved as it provides DSL services to 100% of its landline telephone service area which also includes fiber to the home in its two largest exchanges of Muenster and Valley View, Texas. It also provides wireless internet via 700 Mhz licenses in areas lying outside of the landline service area and its affiliate provides cable
modem broadband services outside of the telephone serving area for the cities of Saint Jo, Lindsay, Lake Kiowa and Collinsville.

-----Service Area:  ID_Jefferson

Submitter:  DigitalBridge Communications Corp.

Comment:  DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant's PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 80% overlap of its coverage with the PFSA based on households served.

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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: ID_Elmore

Submitter: Windjammer Communications LLC

Comment: Windjammer Communications and its predecessors have provided fixed broadband internet services in Mountain Home and Mountain Home Air Force Base, Elmore County, ID since 2002, offering options ranging from 768 kbps to 10 mbps download to residential and commercial customers.
-----Service Area: MT_Valley

Submitter: Nemont Telephone Cooperative, Inc.

Comment: The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in the area. Nemont can demonstrate that for the area served by Nemont in the proposed funded service area that the designation of "unserved" is not applicable. The services that Nemont offers and provides in this proposed funded service area far exceed the thresholds set of more than 10% of households having access to broadband service (as defined in the NOFA).

-----Service Area: KS_Labette

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:  Craw-Kan Telephone Cooperative, Inc.

Comment:  Craw-Kan Telephone Cooperative, Inc. (CKT) is a telecommunications company serving rural areas of Southeast Kansas, Southwest Missouri and Northeast Oklahoma with high quality communication services for more than 55 years. As a full service provider, CKT was among the first in the area to provide broadband service to rural customers. CKT has diligently worked to extend broadband services to over 97% of our customer base. CKT counts among its broadband service customers community anchor institutions including public safety agencies, schools, libraries and healthcare providers. CKT is in the midst of a Fiber to the Home project to provide additional broadband capability in an ever evolving industry.
-----Service Area: SD_Marshall

Submitter: RC Technologies

Comment: As illustrated on the map below, the proposed funded service area of the applicant, Satellite Broadband ARRA Application LLC, proposes to service an area (Marshall) currently served by RC Technologies (RCT). Within the 150 square mile area of overlap, RCT has the capability to provide broadband service via DSL with speeds of up to 1.5 Mbps down and 768 Kbps up to 100% of households and businesses.

Submitter: Venture Communications Cooperative

Comment: Venture Communications Cooperative demonstrates that it provides broadband service throughout Marshall County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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.

-----Service Area: SD_Brule

Submitter: Midstate Communications, Inc.

Comment: We serve this area and offer 3 mg broadband service.
-----Service Area:  WY_Platte

Submitter:  James Cable LLC

Comment:  James Cable provides 5Mb service to the community of Wheatland, Wyoming.

Submitter:  Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment:  Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers.  Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

-----Service Area:  MT_SweetGrass

Submitter:  Triangle Telephone Cooperative

Comment:  Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of unserved under the ARRA.

-----Service Area:  NE_Hamilton

Submitter:  Henderson Cooperative Telephone Company

Comment:  Henderson Cooperative Telephone Company, dba Mainstay Communications, currently provides service in its certificated exchange area that meets or exceeds all ARRA NOFA requirements to be classified as a "Served" area. 100% of households have access to Broadband service of at least
The current residential penetration rate of Broadband service at a speed of 768/200 Kbps or higher is 64%. Henderson Cooperative Telephone offers a 5 Mbps Broadband service.

Submitter: Glenwood Telecommunications Inc.

Comment: Glenwood Telecommunications has been providing state-of-the-art telecommunication services in this area including High Speed Internet for over 8 years.

Submitter: Hamilton.net, Inc.

Comment: DSL continues to be offered in this entire response area. With DSL, our standard packages offer speeds from 768k down/256k up to 6Mb down/512Mb up. In addition to DSL, in the western and southern portions of this area we offer unmetered broadband services using 3G 1XEVDO/Rev A. Our brand name for this service is "GMAX" and has a maximum download speed of 3.1Mb. This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service. We also offer unlicensed wireless services in portions of this area as well with 768k down/768 up speeds. With our DSL service alone we have a market penetration of residential households of 47.8%, and a business penetration of 45.7%.

-----Service Area: KS_Greeley

Submitter: Sunflower Telephone Company

Comment: Sunflower Telephone Company ("Sunflower") is responding to this Public Notice Filing regarding Satellite Broadband ARRA Application LLC’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is located in Greeley County, Kansas. Sunflower is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 100% of its service area as outlined in response area map in Greeley County, Kansas. For the proposed funded service area which overlaps with Sunflower’s incumbent service area, the applicant claims that it is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “underserved” is not true.

-----Service Area: OK_Osage
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 least ten years. Cox provides its customers in Oklahoma 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:  Cimmaron Telephone Co.

Comment:  Cimarron Telephone Company through its subsidiary Cim-Tel Cable, LLC, has been offering broadband speed data service to subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service. Cim-Tel Cable, LLC also offers IPTV service to its subscribers within the communities Cimarron Telephone Company serves.

Submitter:  Windstream

Comment:  Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as underserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

The agencies define an “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded...
service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Shidler Telephone Company

Comment: Shidler Telephone Company is an RUS borrower and currently provides broadband access capability to 100% of the households within its service territory. As of June 30, 2009, Shidler provided broadband to over 41% of its residential customers with 44% of those customers subscribing to either an enhanced or premium broadband plan, both of which exceed 768Kbps speed. Shidler’s premium broadband service provides downstream speeds of 1.5Mbps. Shidler continues to invest in its broadband network and plans to offer 3Mbps broadband service to its subscribers. Each of Shidler’s broadband internet service offerings are priced competitively as is apparent from Shidler’s high subscriber penetration rates. Clearly, the portion of the "PFSA" that encompasses Shidler Telephone Company’s serving territory is not unserved or underserved.

-----Service Area: CO_Gunnison

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Gunnison will be served by Stelera Broadband a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.
Submitter:  Qwest

Comment:  As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband Gunnison for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

Submitter:  Nucla-Naturita Telephone Co.

Comment:  Nucla-Naturita Telephone Company, d.b.a. NNTC Wireless, has been providing high-quality communication services to the remote and mountainous areas of western Colorado for more than sixty years. We were among the first in the area to provide broadband service. In 2003, NNTC’s customers could access the Internet at 640 kbps, a speed at the time that rivaled metropolitan areas. NNTC continually stays atop off technological trends offering its customers ever-increasing speeds. In 2006, customers were offered broadband service at speeds topping out at 3 Mbps.

NNTC operates in the Rocky Mountains and provides service to community anchor institutions including forest service offices and wildfire stations. Due to the extreme terrain, some remote areas were unable to receive broadband services over wireline facilities. In order to serve these residents and institutions, NNTC invested in wireless spectrum in 2005. Customers can now access wireless broadband services including 3G EVDO wireless access. NNTC is a local company, proudly serving the western slopes of the Rocky Mountains. It looks forward to the next 60 years, keeping this geographically remote area on the technological cutting edge.

-----Service Area:  TX_Castro
Submitter: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Panhandle, Dimmitt, Hart and Nazareth Texas for which funds are being requested in this application; we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

-----Service Area:  SD_Faulk

Submitter: Venture Communications Cooperative

Comment: Venture Communications Cooperative demonstrates that it provides broadband service throughout Faulk County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, virtually 100% of households in Venture’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 Venture; virtually 100% of the households in Venture’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; Venture 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.

-----Service Area:  TX_Jack

Submitter: James Cable LLC

Comment: James Cable provides 8Mb broadband service to the community of Jacksboro, Texas. We provide 3Mg service to the community of Bryson, Texas.
---Service Area: OK_Canadian

Submitter: Cox Communications

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 least ten years. Cox provides its customers in Oklahoma 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.

-----Service Area: KS_Rice

Submitter: H&B Communications
Comment: H&B provides broadband speeds of up to 10Mbps in the Bushton telephone exchange area. This service is available throughout the entire exchange. H&B also provides speeds of up to 6Mbps within the Chase city limits.

Submitter: Mutual Telephone Company
Comment: Mutual Telephone Company is a cooperative telephone company headquartered in Little River, KS. MTC has been in operation for 104 years. Through the organization and its subsidiary company, high-speed internet is available throughout all of Rice County, KS.

Submitter: KeyOn Communications
Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----Service Area: IA_Calhoun
Submitter: Evertek, Inc

Comment: Evertek 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: Webster-Calhoun Cooperative Telephone Association

Comment: Webster-Calhoun Cooperative Telephone Association demonstrates that it provides broadband service throughout Calhoun County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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.

-----Service Area: TX_Dawson

Submitter: Poka Lambro Telephone Cooperative, Inc.

Comment: Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.
Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Lamesa is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

-----Service Area: KS_Jewell

Submitter: Cunningham Communications

Comment: Cunningham Telephone Company, with its affiliate Cunningham Communications has been providing high-quality communications services to the residents of the rural communities of northwestern Kansas for more than 65 years. It was one of the first providers in this remote area to offer broadband services eleven years ago. Currently, almost 100% of Cunningham’s service areas have broadband capability reaching speeds up to 10 Mbps.

In keeping with its long tradition of providing cutting-edge technologies, Cunningham has begun a Fiber To The Home (FTTH) project. Through this FTTH project, estimated to be completed in 2012, every customer in a majority of Cunningham’s service areas, even in the most remote rural areas, will have a direct fiber feed from their home and business to the world.

Cunningham is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Cunningham provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because Cunningham’s owners and employees have a personal stake in the communities where they work and live.
Submitter: Prairie Telephone Co., Inc dba Western Iowa Networks

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Pacific Junction, IA exchange and the southern portion of the Macedonia, IA exchange served by Prairie Telephone Co., Inc and Breda Telephone Corp. dba Western Iowa Networks. 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. In the public notice response Prairie Telephone Co., Inc dba Western Iowa Networks (Prairie) is providing; 1) a map of the overlapping area Prairie provides broadband services, 2) Prairie'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: Southwest Telephone Exchange

Comment: Southwest Telephone Exchange demonstrates that it provides broadband service throughout the Emerson and Henderson Areas which are encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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: Qwest
Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband ARRA Application LLC, IA Mills for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: MT_Lincoln

Submitter: Citizens Telecommunications Company of Montana

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

-----Service Area: TX_Gaines

Submitter: Stelera Wireless, LLC

Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 9-10 mbps. The town of Seminole is served by Stelera Broadband a broadband service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant’s proposed service area.
---Service Area: KS_Kiowa

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.

Submitter: Haviland Telephone Co., Inc.

Comment: Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Kiowa County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes the towns of Mullinville and Haviland and adjacent rural areas.

The company also provides Wi-Max service in the town of Greensburg and adjacent rural areas to every customer location at speeds above the NOFA definition of broadband.

---Service Area: MT_Beaverhead
**Submitter:** 3 Rivers Telephone Cooperative, Inc.

**Comment:** This applicant’s proposed project covers all 26 of our existing exchanges and 3 CLEC areas served by 3 Rivers Telephone Cooperative, Inc. We currently serve these exchanges over an extensive existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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:** Southern Montana Telephone Company

**Comment:** Respondent offers broadband speeds of at least 768 kbps downstream and 512 kbps upstream to the Applicant’s entire proposed funded service area that overlaps Respondent’s service area.

-----Service Area: ND_McKenzie

**Submitter:** Reservation Telephone Cooperative

**Comment:** The applicant contends the Proposed Funded Service Area (McKenzie County), which overlays an RTC service area, is unserved/underserved. As the incumbent service provider, and there are no competitors or the number is limited, RTC has access to sufficient information to determine whether the service area is underserved/unserved and has concluded it is not. According to RTC’s analysis, over 100 percent of the residential households in the service area have access to broadband service, as defined in the NOFA, and are capable of being served. Of those households capable of being served, the broadband penetration rate is over 68 percent. Additionally, RTC advertises broadband service which is capable of speeds over 3 Mbps throughout the service area, including in the area newspapers and magazines, direct mail and area radio stations.
RTC has or is also completed FTTH to portions of the area by the end of this year. Adding the capabilities of higher speeds, video services and expanding the area served with high quality FTTH capable of 1000 Mbps.

Submitter: Consolidated Telcom

Comment: Consolidated Telcom service territory overlaps approximately 3.9% of the Satellite Broadband Application LLC McKenzie proposed funded service area (PFSA). In addition, Consolidated serves the entire overlap area with broadband service and advertizes speeds at 20 meg in the majority of the area. Consolidated’s broadband penetration is over 50% of the overlap area.

Service Area: IA_Fremont

Submitter: Prairie Telephone Co., Inc dba Western Iowa Networks

Comment: Satellite Broadband ARRA Application LLC's proposed project covers the Farragut, IA exchange served by Prairie Telephone Co., Inc dba Western Iowa Networks. We currently serve the exchange 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. In the public notice response Prairie Telephone Co., Inc dba Western Iowa Networks (Prairie) is providing; 1) a map of the overlapping area Prairie provides broadband services, 2) Prairie'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: Southwest Telephone Exchange

Comment: Southwest Telephone Exchange demonstrates that it provides broadband service throughout the Imogene Area which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC 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: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband Fremont for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: WY_Park

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.
Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

-----Service Area: TX_Hutchinson

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: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Stinnett, Texas for which funds are being requested in this application, we are filing comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

-----Service Area: NE_Merrick

Submitter: Clarks Telecommunications Company
Comment: Clarks Telecommunications Company (CTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps CTC’s service area.

CTC was organized in 1908 and in 2007 was acquired by Northeast Nebraska Telephone Company (NNTC), a customer owned cooperative.

CTC is presently a borrower with the Rural Utilities Service and has been since 1957.

Within the PFSA overlap, CTC’s recently constructed buried fiber optics cable to the premise (FTTP) network provides access to Broadband services to 100% of the residential households and businesses, CTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and with this new buried FTTP network CTC anticipates the rate of subscription to be greater than 40% in a relatively short period of time.

Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTP Broadband capable network, and divert funding that could be available for unserved areas.

Submitter: Hamilton.net, Inc.

Comment: Hamilton.net just began offering stationary unmetered broadband services using 3G 1XEVDO/Rev A in this location. Our brand name for this service is "GMAX". This service is configured as a data only solution and is intended to offer a competitive alternative to DSL and cable modem service. Hamilton.net has also been offering broadband services using 5700 MHz and 900 MHz unlicensed wireless equipment in a large portion of this area for several years.

-----Service Area: TX_PaloPinto
Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our
average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: James Cable LLC

Comment: James Cable provides 3M broadband service to the community of Graford, and Possum Kingdom Lake, Texas.

-----Service Area: NE_Deuel

Submitter: ATCJet.net LLC

Comment: ATCJet.net, LLC provides high speed broadband internet service to its service territory with download speeds ranging from 1 Mbps up to 7 Mbps; and upload speeds from 256 kbps up to 768 kbps. ATCJet.net, LLC does not charge an installation fee and monthly pricing plans begin at an affordable rate of $29.95. ATCJet.net, LLC is capable of offering broadband service to all the households in its service territory.

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Satellite Broadband ARRA Applications LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

Submitter: Dalton Telephone Company
Comment: Dalton Telephone Company, Inc. (DTC) has been providing high-quality communications services to the residents of the rural communities and Villages of Dalton, Gurley, Lodgepole, Dix, Potter and Bushnell, Nebraska for 92 years. It was one of the first providers in this remote area to offer broadband services seven years ago. Currently, 99% of DTC’s service areas have broadband capability. Because of DTC’s advanced network it can meet the local geographical challenges providing important community anchor institutions including local government and public safety agencies with broadband services. This local presence also allows DTC to provide 24-7 customer service and support. Due to DTC’s entrepreneurial spirit and its dedication to its customers and through a substantial investment in advanced network facilities, the rural communities and surrounding areas of Dalton, Gurley, Lodgepole, Dix, Potter, and Bushnell, Nebraska enjoy the same level of service as offered in metropolitan areas.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satelite Broadband Deuell for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: CO_Arapahoe

Submitter: Eastern Slope Rural Telephone Association, Inc.

Comment: Eastern Slope Rural Telephone Association, Inc. (ESRTA) has been providing high-quality communications services to rural eastern Colorado for 57 years. Based on our history of serving difficult-to-serve areas that larger providers ignore, ESRTA is committed to providing our customers with advanced, reliable communications service, regardless of where they live and work. To this end, ESRTA is capable of providing broadband services at speeds exceeding 5 Mbps download.

ERSTA is a local company that provides much-needed jobs, 24-7 customer service and local offices. ERSTA is proud to count among its broadband customers community anchor institutions including schools, hospitals, local government offices and public safety agencies. It serves from a local perspective because ERSTA’s owners, who are also its customers, have a personal stake in the communities where they work and live.
Submitter: Time Warner Cable Inc

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: Rhino Communications

Comment: Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Incumbent Local Exchange Carriers, and RC’s network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC’s, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC’s opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.
Service Area: SD_Clark

Submitter: Interstate Telecommunications Cooperative

Comment: Interstate Telecommunications Cooperative (ITC) demonstrates that it provides broadband service throughout many portions of Clark County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application and that the proposed funded Service Area is not unserved or underserved. As demonstrated, 100% of households in ITC’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 ITC; 100% of the households in ITC’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; ITC advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout many portions of the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is one percent of households. Monies are currently being expended to upgrade facilities to offer minimum 1.5Mbps and higher speeds to the entire service area.

Service Area: KS_Elk

Submitter: The Southern Kansas Telephone Co., Inc.

Comment: The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT’s owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.
-----Service Area:  CA_Placer

Submitter:  Foresthill Telephone Company, dba Sebastian

Comment:  Foresthill Telephone, dba, Sebastian, is challenging the applications for ARRA funding for the Foresthill Telephone exchange. The Foresthill telephone exchange exceeds the federal NTIA/RUS unserved and underserved definition. Audeamus, a non-regulated affiliate of Sebastian launched high-speed Internet service back in 2005 consistent with the acquisition of this exchange. Sebastian is currently offering the choice of 6 Mbps, 2.5 Mbps, and 1.5 Mbps to its customers. The Foresthill Telephone exchange has a broadband penetration rate estimated at 58% and growing. As stated in the NOFA ARRA grants are designed to fund areas where no broadband connectivity exists (i.e. are either unserved or underserved). This is not the case in the Foresthill exchange. Applicants also fail in the requirement to demonstrate that service would not exist absent support from the grant funds – services already exist in this area. As the area served by Sebastian does not meet the required criteria, the request for funding in our service territory for this application should be denied.

Submitter:  WaveDivision Holdings, LLC

Comment:  WaveDivision Holdings, LLC (“Wave”) is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Satellite Broadband ARRA Application LLC (“Applicant”) for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed service area is significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.

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: SureWest Communications

Comment: Respondent disputes herein that some of the service area proposed for funding by Satellite Broadband ARRA Application LLC is neither underserved nor unserved. Putting aside the issue of other existing providers, for alleged unserved area, respondent shows that in the proposed funded service area, it currently advertises and provides fixed broadband service with transmission speeds of at least 768 kbps downstream and 200 kbps upstream, and that more than 10 percent of the households in the proposed funded service area currently have access to that service for alleged underserved area. Respondent also shows that in the proposed funded service area, 1) it currently advertises and provides fixed broadband service with transmission speeds of at least 3 mbps downstream, 2) that more than 50 percent of the households in the proposed funded service area currently have access to that service, and 3) that more than 40% of the households in the proposed funded service area currently subscribe to broadband service. The wireline broadband service providers in the area are AT&T, SureWest, WaveBroadband and Comcast and various wireless broadband providers.

The applicant cuts a wide swath as specified above in areas that are neither un-served or underserved. The specific CBGs are 0206011, 0206012, 0206013, 0206014, 0206041, 0206042, 0206043, 206044, 0206051, 0206052, 0206061, 0211091, 0206024, 0211071, 0211072, 0211091, 0211082, 0213044, 0213011-0213012, 0213031, 0214011-0214012, 0214021-0214024.

-----Service Area: KS_Shawnee

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 least ten years. Cox provides its customers in Kansas 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: Mercury Wireless, LLC

Comment: Mercury Wireless currently provides up to 3 mbps wireless Internet access to sections of the applicant’s proposed service area.
-----Service Area: NV_Storey

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 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.

-----Service Area: OR_Union

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.

-----Service Area: OR_Linn

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline
and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: TX_Dickens

Submitter: Cap Rock Telephone Cooperative, Inc.

Comment: Dickens County Texas is being labeled as an Underserved rural area. We challenge the position regarding the Dickens County Texas rural population as an underserved location.

As the Incumbent Local Exchange Carrier in this rural area (see map) we provide landline and broadband service offerings throughout Dickens County Texas. Equally as important the rural areas are sparsely populated and providing these services is not without challenge. The communities within Dickens County Texas have broadband services readily available. The communities of Afton, Spur and Dickens have multiple broadband service providers available to all residents and business. Cap Rock Telephone Cooperative, Inc. will continue to invest in providing services to customers in rural Texas including Dickens County Texas.

Cap Rock Telephone Cooperative, Inc. is currently one broadband service provider in the Dickens county rural area. Competition exists with limited potential customers. Satellite service providers, cable broadband service providers and wireless broadband opportunities are available in Dickens County Texas.

Due to competition it is our request that any proprietary information contained within this formal response filing is kept confidential.

-----Service Area: ND_Benson

Submitter: North Dakota Telephone
Comment:  North Dakota Telephone Company (NDTC) service territory overlaps approximately 100% of the Satellite Broadband Application LLC Benson proposed funded service area (PFSA). Satellite Broadband Application LLC designates this area as both unserved and underserved. Since NDTC serves the entire area claimed to be unserved, this PFSA does not qualify for funding. NDTC also serves the entire area claimed to be underserved with broadband service and advertises speeds of 6 meg. The penetration for NDTC alone is reasonable in the area so when combined with other providers the total penetration maybe over 40%. This PSFA does not qualify for funding because the area is fully served.

------Service Area: KS_Harper

Submitter: Haviland Telephone Co., Inc.

Comment: Haviland Telephone Co., Inc. provides Digital Subscriber Line broadband service in Harper County, KS at speeds exceeding the NOFA definition. The service is offered at every customer location. This includes rural areas of the telephone exchange areas of Norwich and Argonia.

Submitter: South Central Telephone Association, SCTelcom

Comment: SCTA, established in 1953, is submitting a response to dispute service availability for a portion of the applicant’s area. We would like to establish the fact that we are providing broadband access exceeding the 768 Kbps minimum as defined by the NOFA. We have been advertising High speed Broadband service of 1.5, 3, and 6Mbps in our response area.

Submitter: KanOkla Networks

Comment: KanOkla Networks has been providing our customers the best in telecommunications/data technology for almost 60 years. We are the leader in our service areas for rolling out new and innovative services to our subscribers. We currently offer broadband service, at speeds up to 6 Mbps, to 100% of our current and potential customers. KanOkla is in the midst of installing Fiber To The Home (FTTH) to all of our exchange areas, bringing the capability of 100 Mbps to all homes and businesses throughout our areas. This project, with its wealth of bandwidth for our subscribers, will position our communities for the future.
-----Service Area: CO_SanJuan

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Satellite Broadband San Juan for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: NE_Wheeler

Submitter: Northeast Nebraska Telephone Company

Comment: Northeast Nebraska Telephone Company (NNTC) is filing this response to the Satellite Broadband ARRA Application LLC, (Applicant) Application because we are of the belief that this Application misrepresents the availability of Broadband service (786k downstream/200k upstream) within the area that the Applicant’s proposed funded service area (PFSA) overlaps NNTC’s service area.

NNTC was organized as a cooperative in 1955 and is owned by its customer/members.

NNTC is presently a borrower with the Rural Utilities Service and has been since 1955.

Within the PFSA overlap NNTC’s buried fiber optics cable to the node (FTTN) network provides access to Broadband services to 100% of the residential households and businesses, NNTC advertises Broadband service of 3 Megabits and greater to 100% of the residential households and businesses, and NNTC has a rate of Broadband subscribership that is greater than 40%.
Applicant’s request for funds to build another Broadband capable network, if granted, will be a duplication of investment, duplication of an existing FTTN Broadband capable network, and divert funding that could be available for unserved areas.

Submitter: Nebraska Central Telephone Co.

Comment: The respondent (Nebraska Central Telephone Company) believes that the applicant Satellite Broadband LLC has misinterpreted the availability of Broadband Internet access service in the response polygon area that represents the respondent’s service area. The respondent is a Local Exchange Carrier (Common Carrier) that offers wireline facilities based Broadband (high speed) Internet access service in the overlap area of the PFSA.

Respondent can provide Broadband Internet access service exceeding 768K downstream and 200K upstream speeds to over 98% of the households and businesses in its response polygon. In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream. The advertising copy shows that the basic package of Broadband offered by the respondent exceeds the minimum speeds for categorization of a PFSA as “unserved”. As such, the applicant’s request for funds based on the area being “unserved” should be rejected.

In some cases, respondent does not cover an entire zip code with its response polygon, although the business counts generated by the system include all businesses in a reported zip code. As a result some of the business counts reflected in the “Businesses in Zip codes in Polygon” count are not included in respondent's response polygon (overlap area).

-----Service Area: TX_Lipscomb

Submitter: AMA TechTel

Comment: As a Texas service provider serving many rural communities including Lipscomb, Darouzett, Follett and Higgins, Texas for which funds are being requested in this application, we are filing
comments to give the determining authority complete information so that they can accurately distribute funds to those areas that are either unserved or underserved as required by the NOFA.

-----Service Area: KS_Rush

Submitter: GBT Communications

Comment: Golden Belt Telephone and its affiliate, GBT Communications (GBT) have been providing high-quality communications services to rural and remote communities in Western Kansas for over 56 years. GBT is committed to bringing cutting-edge technologies to residents of areas that larger providers ignore. As a result, GBT has pioneered many services in this part of the country including providing broadband services for over 12 years and now has over 3,000 broadband customers throughout its service areas that can access the Internet at speeds up to 6 Mbps. To ensure that its customers’ traffic had the best possible backbone, GBT began laying fiber to connect its remote service areas in 1989. Twenty years later, GBT’s customers enjoy advanced services due to over 1000 miles of fiber within GBT’s service areas. Looking to the future when customers will need large amounts of bandwidth at high speeds, GBT has begun a Fiber-To-The-Home (FTTH) project. Upon completion, 100% of customers in regulated service areas will have broadband access at fiber-speeds.

Currently, GBT customers can access broadband services through a variety of technologies, including FTTH, traditional copper, fixed wireless, unlicensed wireless (Wi-Fi) and cable modem. GBT employs multiple broadband technologies based on its knowledge of the specific needs of the communities it serves coupled with its half-century of experience providing advanced communication services in difficult to serve areas.

GBT is a local company that anchors the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. GBT provides necessary broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies. It serves from a local perspective because GBT’s owners, who are also its customers, have a personal stake in the communities where they work and live.
-----Service Area: MT_DeerLodge

Submitter: Southern Montana Telephone Company

Comment: Respondent offers broadband speeds of at least 768 kbps downstream and 512 kbps upstream to the Applicants's entire proposed funded service area that overlaps Respondent's service area.

-----Service Area: KS_Ellsworth

Submitter: H&B Communications

Comment: H&B Communications, Inc. provides broadband speeds of up to 10Mbps to the entire Holyrood telephone exchange area. Their service is currently taken by 139 households/businesses in the area. H&B also provides broadband service within the city limits of Lorraine at speeds up to 6Mbps, which is currently in 24 households/businesses.

Submitter: Wilson Telephone Co Inc dba Wilson Communications

Comment: Wilson Communications has been providing high quality and leading technology telecommunications services to rural Kansans for more than sixty years. Wilson Communications began offering high speed internet access service to our customers in the late 1990’s. We continued to expand our fiber network and now can provide broadband services to 100% of our customers. Wilson Communications continues to make investments in fiber optic facilities to ensure our customers have access to the latest broadband technology. We provide broadband to critical community anchor institutions including schools, rural health clinics, and public libraries. We are a full service provider of communications services and are able to bundle services offering discounts to our customers. Wilson Communications is a community based company, providing volunteerism, and other forms of support to each of the seven communities we serve.

-----Service Area: NE_Washington
Submitter: Jagwireless

Comment: To Whom It May Concern: Hello, my name is Danny Olsen and I am writing this on behalf of my employer, jagWIRELESS. jagWIRELESS specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrums 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 50 tower sites. In the areas we provide service we often compete with wire-line 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 that Satellite Broadband ARRA Application LLC has requested funds to build a network in Cass County, NE. from the Broadband stimulus program. I wish to submit a dispute regarding the “underserved” designation of this area by Satellite Broadband ARRA Application LLC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both or organization to provide quality services. The areas which Satellite Broadband ARRA Application LLC intends to provide service already have 2 or more local providers and can also receive mobile broadband services from various national mobile providers. This area does not need additional broadband competition as it is well served by private organizations who have invested private dollars to services the broadband needs of the area residents. Underserved Criteria – Advertised Speeds Our wire-line competitor offers speeds of 6 Mbps in each of these service areas and Logenet offers speeds of 3 Mbps in each of the service areas. Attached is an advertisement showing that we do advertise these speeds which AlphaStar would like to service. Penetration Rate Our organization does regular marketing by multiple methods and we occasionally trade customers with the DSL carrier but we are most after the new residents to the area who are newly choosing between multiple carriers. Our organization has been offering services in this market for 7 years. Based on our marketing and survey’s we find that market penetration between our services and those competing with us is well into the 60% range. The remaining 40% of households simply do not want or cannot afford any of the competing service providers, who offer services as low as $25/mo.

------Service Area: TX_Crockett

Submitter: Big Bend Telephone Co.

Comment: Big Bend Telephone Comapany, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has
served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----Service Area:  WA_Franklin

Submitter:  CenturyLink

Comment:  The proposed service areas are not wholly underserved or unserved.

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. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review.

This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas.

CenturyLink has committed to upgrade and extend broadband.

CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink
committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

**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 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.

-----Service Area: KS_Greenwood

**Submitter:** The Southern Kansas Telephone Co., Inc.

**Comment:** The Southern Kansas Telephone Co., Inc. (SKT) has been providing service to rural Kansas communities for 70 years. SKT is committed to providing rural Kansans broadband service that helps both increase the quality of life and allows them to conduct business in a much more productive
manner. As an example of this commitment, SKT began offering broadband service in 2001. SKT has continuously upgraded its fiber network over the years to meet the service needs of its customers. SKT currently offers broadband service up to and exceeding 12.0 M downloads and 1.0 M uploads. SKT customers benefit from local customer care, 24/7 support, multiple service discounts, free hardware and installation options that make broadband service more affordable and easier to get connected. SKT’s owners and 54 employees are local Kansans who understand the needs of their customers and the importance of supporting the rural communities they serve. To help these communities flourish in the future, SKT provides complimentary broadband service to all local municipalities, including city, police, fire, and EMS locations, as well as libraries and senior centers. SKT will continue to focus on providing vital broadband services for rural Kansans.

-----Service Area:  ND_McHenry

Submitter:  North Dakota Telephone Co.

Comment:  North Dakota Telephone Company (NDTC) service territory overlaps approximately 17.7% of the households in the Satellite Broadband Application LLC McHenry proposed funded service area (PFSA). Satellite Broadband Application LLC McHenry designates this area as underserved and unserved. In the overlapping area, NDTC service advertises 6 meg service.

Submitter:  SRT Communications Inc

Comment:  The Applicant has applied for Broadband Stimulus support in areas (Cities/Townships/Census Block identified below) in the SRT Communications Inc. service area that do not qualify as unserved or underserved. SRT Communications Inc. provided 4 Mbps and 8 Mbps service in those areas.

<table>
<thead>
<tr>
<th>County Sub</th>
<th>Population</th>
<th>Housing Units</th>
<th>Households</th>
</tr>
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<tbody>
<tr>
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<td>286</td>
<td>141</td>
<td>120</td>
</tr>
<tr>
<td>Karsruhe City</td>
<td>119</td>
<td>70</td>
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<td>295</td>
</tr>
<tr>
<td>Upham City</td>
<td>155</td>
<td>120</td>
<td>81</td>
</tr>
</tbody>
</table>
Submitter: BEK Communications Cooperative

Comment: Satellite Broadband ARRA’s proposed project covers exchanges served by BEK Communications Cooperative. BEK currently serves all its exchanges by an existing fiber network that extends from our corporate headquarters in Steele, ND. In this public notice response BEK is providing; 1) a map of the overlapping area where BEK provides broadband services, 2) BEK’s DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from BEK within its service territory, 4) the number of residential households and business establishments subscribing to BEK’s broadband service within the proposed service area, 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: Dakota Central Telecommunications

Comment: Dakota Central Telecommunications demonstrates that it provides broadband service throughout Logan County which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 95% of households in Dakota Central’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 Dakota Central; 95% of the households in Dakota Central’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; Dakota Central 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 subscribeship for the proposed funded Service Area is greater than 40 percent of households.
Submitter: Dickey Rural Networks

Comment: Dickey Rural Networks demonstrates that it provides broadband service throughout Logan County, which is encompassed in the proposed funded Service Area in the Satellite Broadband ARRA Application LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural’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 Dickey Rural; 100% of the households in Dickey Rural’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; Dickey Rural 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 subscribeship for the proposed funded Service Area is greater than 40 percent of households.

-----Service Area: UT_Rich

Submitter: Central Telcom Services, LLC

Comment: Central Telcom Services, LLC dba CentraCom Interactive provides 5 mg high speed internet service, as well as video and voice services to communities throughout Sanpete County, Utah.

-----Service Area: KS_Haskell

Submitter: United Telephone Association

Comment: United Telephone Association, with its affiliate United Wireless, has been providing high-quality communications services to the residents of the rural communities of southwestern Kansas for more than 58 years. It was the first provider of Internet access services in this remote area when it offered dial-up in 1997, wireline broadband in 2000 and wireless broadband in 2005. Currently, 100% of
United’s service areas have broadband capability reaching speeds up to 5 Mbps for both wireline and wireless broadband services. United’s EVDO RevA network supports wireless broadband at speeds of 1.5Mbps. United is proud to provide broadband services to community anchor institutions including schools, libraries, local government offices and public safety agencies.

United is a local cooperative that helps anchor the communities it serves. It serves from a local perspective because United’s owners, who are also its customers, have a personal stake in the communities where they work and live. United provides much-needed jobs, 24-7 customer service and local offices. Due to the geographical remoteness of its service areas, United makes every effort to ensure that its customers have access to not only the latest network technology but also the latest consumer equipment and support services. This necessary equipment and service includes a wide selection of wireless phones including smartphones, broadband-capable aircards, metering devices, wireless routers, netbooks, computer support and website design. United is more than a communications company to the residents of southwest Kansas – it is a important part of the local economy.