Applicant Name: Pinpoint Communications, Inc.

----Service Area: Fremont

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: Valentine

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 Viaero 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 1748 households of which 146 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.

Submitter: Great Plains Communications, Inc.

Comment: Pinpoint Communications, Inc. (Pinpoint) has applied for broadband funding for ten proposed funded service areas (PFSAs) in Nebraska. Pinpoint has characterized these projects as “Middle Mile” but when the maps are examined many of the Pinpoint PFSAs appear to be “Last Mile” projects.

Great Plains Communications, Inc. (GPC) will respond to 6 of the 10 Pinpoint NE PFSAs. This response is directed to the Pinpoint – Valentine PFSA. This PFSA incorporates almost 2,349 square miles and is identified as “underserved”. GPC has 15 miles of fiber within the Valentine PFSA. GPC is also aware that Qwest Communications has significant fiber facilities in this area. Thus, the additional fiber proposed by Pinpoint in the Valentine PFSA is unnecessary and redundant for this rural area. GPC offers existing fiber in northern Nebraska under the same terms and conditions that Pinpoint sets forth in its Executive Summary.

The Pinpoint – Valentine PFSA, based on its map and brief description, is not only imprecise and overly broad but defines a “Last Mile” rather than a “Middle Mile” project. The rhetoric in Pinpoint’s Executive Summary describes a request for funding for an area already well served with broadband. The middle mile fiber to be constructed is unnecessary in northern Nebraska and would be an unnecessary and inefficient use of stimulus funds.
This PFSA is one of 10 areas in a total grant package of $26.3M for which Pinpoint is applying to provide middle mile (and apparently last mile) infrastructure. This PFSA clearly has sufficient fiber capacity and availability of broadband services to a majority of the population. Granting Pinpoint’s application, on either a middle mile or last mile basis, constitutes an inefficient and redundant use of funds. Therefore, its application should be rejected.

-----Service Area: Chadron

Submitter: Mobius Communications Company

Comment: Mobius Communications Company (Mobius) is a pioneer, providing Internet service in the Nebraska Panhandle since 1996 and broadband service since 1999. We were among the first in the area to provide broadband service to rural Americans, with 100% of the customers in our service areas capable of receiving this advanced service. We are proud of our service to our communities including some of the most remote areas in the Nebraska Panhandle as well as community anchor institutions including public safety agencies, schools, libraries and healthcare providers. As a community-based company, we provide much-needed jobs, 24-7 customer support and local offices for our customers’ convenience in Alliance, Gering, and Hemingford, Nebraska.

Submitter: Hemingford Coop Telephone Co. dba Mobius Comm Co.

Comment: The Hemingford Cooperative Telephone Company (HCTC) was established in 1931 and has been serving customers in these remote and rural communities for over 78 years. Our company, d.b.a. Mobius Communications Company, was among the first in the area to provide broadband service to rural Americans. HCTC began providing Internet service in 1996 and broadband service in 1999. We currently provide high quality, high speed broadband throughout the Nebraska Panhandle and surrounding areas. Broadband service is available to 100% of the homes and businesses in HCTC’s service areas. We are rightly proud of our service to our communities including some of the most remote areas in the Nebraska Panhandle. HCTC provides broadband service to community anchor institutions including public safety agencies, schools, libraries and healthcare providers. We are a
community-based company and our customers are also our owners. We employ 26 members and offer three local offices for our customers’ convenience in Alliance, Gering and Hemingford, Nebraska.

Submitter: Great Plains Communications, Inc.

Comment: Pinpoint Communications, Inc. (Pinpoint) has applied for broadband funding for ten proposed funded service areas (PFSAs) in Nebraska. Pinpoint has characterized these projects as “Middle Mile” but when the maps are examined the PFSAs appear to be “Last Mile” projects.

Great Plains Communications, Inc. (GPC) will respond to 6 of the 10 Pinpoint NE PFSAs. This response is directed to the Pinpoint – Chadron PFSA. This PFSA incorporates over 600 square miles and is identified as “underserved”.

GPC provides broadband service to Chadron through its cable television operation. This can be seen in GPC’s “overlay” map. In addition, GPC has a significant amount of fiber capacity (over 18 miles) in Chadron and elsewhere in the PFSA. GPC is also aware that Qwest Communications has significant fiber facilities in this area. Thus, the additional fiber proposed by Pinpoint in the Chadron PFSA is unnecessary and redundant for this rural area. GPC offers existing fiber in northern Nebraska under the same terms and conditions that Pinpoint sets forth in its Executive Summary.

Pinpoint has mischaracterized Chadron as “underserved”. GPC alone has broadband availability to 86% of the residential and business locations identified in Pinpoint’s Chadron PFSA. GPC has broadband available to 5,920 of the 6,986 people identified in Pinpoint’s Chadron PFSA map.

This area is clearly served with an 86% broadband availability rate as provided by GPC alone. Other broadband providers such as Qwest increase the “served” percentage.

The Pinpoint – Chadron PFSA, based on its map and brief description, is not only imprecise and overly broad but defines a “Last Mile” rather than a “Middle Mile” project. The rhetoric in Pinpoint’s Executive Summary describes a request for funding for an area already well served with broadband. The middle mile fiber to be constructed is unnecessary in northern Nebraska and would be an unnecessary and inefficient use of stimulus funds.

This PFSA is one of 10 areas in a total grant package of $26.3M for which Pinpoint is applying to provide middle mile (and apparently last mile) infrastructure. This PFSA clearly has sufficient fiber capacity and availability of broadband services to a majority of the population. Granting Pinpoint’s application, on
either a middle mile or last mile basis, constitutes an inefficient and redundant use of funds – its 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 Pinpoint Com Chadron for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: Angora

Submitter: Mobius Communications Company

Comment: Mobius Communications Company (Mobius) is a pioneer, providing Internet service in the Nebraska Panhandle since 1996 and broadband service since 1999. We were among the first in the area to provide broadband service to rural Americans, with 100% of the customers in our service areas capable of receiving this advanced service. We are proud of our service to our communities including some of the most remote areas in the Nebraska Panhandle as well as community anchor institutions including public safety agencies, schools, libraries and healthcare providers. As a community-based company, we provide much-needed jobs, 24-7 customer support and local offices for our customers’ convenience in Alliance, Gering, and Hemingford, Nebraska.

-----Service Area: Alliance

Submitter: Mobius Communications Company

Comment: Mobius Communications Company (Mobius) is a pioneer, providing Internet service in the Nebraska Panhandle since 1996 and broadband service since 1999. We were among the first in the area
to provide broadband service to rural Americans, with 100% of the customers in our service areas capable of receiving this advanced service. We are proud of our service to our communities including some of the most remote areas in the Nebraska Panhandle as well as community anchor institutions including public safety agencies, schools, libraries and healthcare providers. As a community-based company, we provide much-needed jobs, 24-7 customer support and local offices for our customers’ convenience in Alliance, Gering, and Hemingford, Nebraska.

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:  Hemingford Coop Telephone Co. dba Mobius Comm Co.

Comment:  The Hemingford Cooperative Telephone Company (HCTC) was established in 1931 and has been serving customers in these remote and rural communities for over 78 years. Our company, d.b.a. Mobius Communications Company, was among the first in the area to provide broadband service to rural Americans. HCTC began providing Internet service in 1996 and broadband service in 1999. We currently provide high quality, high speed broadband throughout the Nebraska Panhandle and surrounding areas. Broadband service is available to 100% of the homes and businesses in HCTC’s service areas. We are rightly proud of our service to our communities including some of the most remote areas in the Nebraska Panhandle. HCTC provides broadband service to community anchor institutions including public safety agencies, schools, libraries and healthcare providers. We are a community-based company and our customers are also our owners. We employ 26 members and offer three local offices for our customers’ convenience in Alliance, Gering and Hemingford, Nebraska.

-----Service Area:  O’Neill

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 65% of households. Three River Telco offers an 8 Mbps service.

Submitter: Great Plains Communications, Inc.

Comment: Pinpoint Communications, Inc. (Pinpoint) has applied for broadband funding for ten proposed funded service areas (PFSAs) in Nebraska. Pinpoint has characterized these projects as “Middle Mile” but when the maps are examined many of the Pinpoint PFSAs appear to be “Last Mile” projects.

Great Plains Communications, Inc. (GPC) will respond to 6 of the 10 Pinpoint NE PFSAs. This response is directed to the Pinpoint – O’Neill PFSA. This PFSA incorporates almost 712 square miles and is identified as “underserved”. GPC has 12 miles of fiber within the O’Neill PFSA. GPC is also aware that Qwest Communications has significant fiber facilities in this area. Thus, the additional fiber proposed by Pinpoint in the O’Neill PFSA is unnecessary and redundant for this rural area. GPC offers existing fiber in northern Nebraska under the same terms and conditions that Pinpoint sets forth in its Executive Summary.

The Pinpoint – O’Neill PFSA, based on its map and brief description, is not only imprecise and overly broad but defines a “Last Mile” rather than a “Middle Mile” project. The rhetoric in Pinpoint’s Executive Summary describes a request for funding for an area already well served with broadband. The middle mile fiber to be constructed is unnecessary in northern Nebraska and would be an unnecessary and inefficient use of stimulus funds.

This PFSA is one of 10 areas in a total grant package of $26.3M for which Pinpoint is applying to provide middle mile (and apparently last mile) infrastructure. This PFSA clearly has sufficient fiber capacity and availability of broadband services to a majority of the population. Granting Pinpoint’s application, on either a middle mile or last mile basis, constitutes an inefficient and redundant use of funds. Therefore, its application should be rejected.
---Service Area: Columbus

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.”

Submitter: Antilles Wireless, LLC

Comment: Antilles Wireless, dba Cable Nebraska, provides high speed data service with speeds higher than 3 Meg to areas of Columbus, NE and all of Richland, NE. Although Cable Nebraska does not serve the entire community of Columbus, the northern area that we do serve, we have 15% penetration in and we have 7% penetration in Richland. We also compete against the local telephone and wireless providers in both communities. It does not seem necessary, nor a benefit, to provide funding to build out last mile projects in either of these served communities.
**Submitter:** Great Plains Communications, Inc.

**Comment:** Pinpoint Communications, Inc. (Pinpoint) has applied for broadband funding for ten proposed funded service areas (PFSAs) in Nebraska. Pinpoint has characterized these projects as “Middle Mile” but when the maps are examined many of the Pinpoint PFSAs appear to be “Last Mile” projects.

Great Plains Communications, Inc. (GPC) will respond to 6 of the 10 Pinpoint NE PFSAs. This response is directed to the Pinpoint – Columbus PFSA. This PFSA incorporates almost 181 square miles and is not identified as “unserved” or “underserved”, i.e. it is served. GPC has 15.5 miles of fiber within the Columbus PFSA. GPC is also aware that Qwest Communications and Cable Nebraska have significant fiber facilities in this area. Thus, the additional fiber proposed by Pinpoint in the Columbus PFSA is unnecessary and redundant for this rural area. GPC offers existing fiber in northern Nebraska under the same terms and conditions that Pinpoint sets forth in its Executive Summary.

The Pinpoint – Columbus PFSA, based on its map and brief description, is not only imprecise and overly broad but defines a “Last Mile” rather than a “Middle Mile” project. The rhetoric in Pinpoint’s Executive Summary describes a request for funding for an area already well served with broadband. The middle mile fiber to be constructed is unnecessary in northern Nebraska and would be an unnecessary and inefficient use of stimulus funds.

This PFSA is one of 10 areas in a total grant package of $26.3M for which Pinpoint is applying to provide middle mile (and apparently last mile) infrastructure. This PFSA clearly has sufficient fiber capacity and availability of broadband services to a majority of the population. Granting Pinpoint’s application, on either a middle mile or last mile basis, constitutes an inefficient and redundant use of funds. Therefore, its application should be rejected.

**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.

-----**Service Area:** Harrisburg
Submitter: Mobius Communications Company

Comment: Mobius Communications Company (Mobius) is a pioneer, providing Internet service in the Nebraska Panhandle since 1996 and broadband service since 1999. We were among the first in the area to provide broadband service to rural Americans, with 100% of the customers in our service areas capable of receiving this advanced service. We are proud of our service to our communities including some of the most remote areas in the Nebraska Panhandle as well as community anchor institutions including public safety agencies, schools, libraries and healthcare providers. As a community-based company, we provide much-needed jobs, 24-7 customer support and local offices for our customers’ convenience in Alliance, Gering, and Hemingford, Nebraska.

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Pinpoint Communications has proposed a project that includes a service area that is already served with 3meg or faster broadband by Vistabeam and other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and also maintains its own middle-mile network to provide service to those areas.

-----Service Area: Neligh

Submitter: Great Plains Communications, Inc.

Comment: Pinpoint Communications, Inc. (Pinpoint) has applied for broadband funding for ten proposed funded service areas (PFSAs) in Nebraska. Pinpoint has characterized these projects as “Middle Mile” but when the maps are examined the PFSAs appear to be “Last Mile” projects.

Great Plains Communications, Inc. (GPC) will respond to 6 of the 10 Pinpoint NE PFSAs. This response is directed to the Pinpoint – Neligh PFSA. This PFSA incorporates over 129 square miles and is identified as “underserved”. GPC provides broadband service to Neligh. This can be seen in GPC’s “overlay” map. In addition, GPC has a significant amount of fiber capacity in Neligh and elsewhere in the PFSA. GPC is also aware that Qwest Communications has significant fiber facilities in this area. Thus, the additional fiber proposed by Pinpoint in the Neligh PFSA is unnecessary and redundant for this rural area. GPC offers existing fiber in northern Nebraska under the same terms and conditions that Pinpoint sets forth in its Executive Summary.
Pinpoint has mischaracterized Neligh as “underserved”. GPC alone has broadband availability to almost 80% of the residential and business locations identified in Pinpoint’s Neligh PFSA. GPC has broadband available to 1,723 of the 2,129 people identified in Pinpoint’s Neligh PFSA map.

This area is clearly served with an 80% broadband availability rate as provided by GPC alone. Other broadband providers such as Frontier, Northeast Nebraska and Plainview Telecom increase the “served” percentage.

The Pinpoint – Neligh PFSA, based on its map and brief description, is not only imprecise and overly broad but defines a “Last Mile” rather than a “Middle Mile” project. The rhetoric in Pinpoint’s Executive Summary describes a request for funding for an area already well served with broadband. The middle mile fiber to be constructed is unnecessary in northern Nebraska and would be an unnecessary and inefficient use of stimulus funds.

This PFSA is one of 10 areas in a total grant package of $26.3M for which Pinpoint is applying to provide middle mile (and apparently last mile) infrastructure. This PFSA clearly has sufficient fiber capacity and availability of broadband services to a majority of the population. Granting Pinpoint’s application, on either a middle mile or last mile basis, constitutes an inefficient and redundant use of funds – its application should be rejected.

-----Service Area:  Ainsworth

Submitter:  Three River Telco

Comment:  Three River Communications LLLC, a wholly owned non-regulated subsidiary of Three River Telco, currently provides service in the City of Ainsworth 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 41% of households. Three River Communications offers an 8 Mbps service.
Submitter: Great Plains Communications, Inc.

Comment: Pinpoint Communications, Inc. (Pinpoint) has applied for broadband funding for ten proposed funded service areas (PFSAs) in Nebraska. Pinpoint has characterized these projects as “Middle Mile” but when the maps are examined many of the Pinpoint PFSAs appear to be “Last Mile” projects.

Great Plains Communications, Inc. (GPC) will respond to 6 of the 10 Pinpoint NE PFSAs. This response is directed to the Pinpoint – Ainsworth PFSA. This PFSA incorporates almost 400 square miles and is identified as “underserved”. GPC has 12 miles of fiber within the Ainsworth PFSA. GPC is also aware that Qwest Communications has significant fiber facilities in this area. Thus, the additional fiber proposed by Pinpoint in the Ainsworth PFSA is unnecessary and redundant for this rural area. GPC offers existing fiber in northern Nebraska under the same terms and conditions that Pinpoint sets forth in its Executive Summary.

The Pinpoint – Ainsworth PFSA, based on its map and brief description, is not only imprecise and overly broad but defines a “Last Mile” rather than a “Middle Mile” project. The rhetoric in Pinpoint’s Executive Summary describes a request for funding for an area already well served with broadband. The middle mile fiber to be constructed is unnecessary in northern Nebraska and would be an unnecessary and inefficient use of stimulus funds.

This PFSA is one of 10 areas in a total grant package of $26.3M for which Pinpoint is applying to provide middle mile (and apparently last mile) infrastructure. This PFSA clearly has sufficient fiber capacity and availability of broadband services to a majority of the population. Granting Pinpoint’s application, on either a middle mile or last mile basis, constitutes an inefficient and redundant use of funds – its application should be rejected.