Applicant Name: GlenMartin, Inc.

Public Notice Submissions

-----Service Area: 6 Nevada Dade

Submitter: Mediacom Communications Corporation

Comment: A large number of households in applicant's proposed service area are currently served by at least two wireline broadband service providers including Mediacom and Socket. 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.

-----Service Area: 6 Nevada 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.

Submitter: American Broadband DSL

Comment: K.L.M. Telephone Company is an incumbent local exchange carrier (ILEC), which is authorized by the Missouri Public Service Commission (PSC) and the Federal Communications Commission (FCC) to provide advanced and reliable telecommunications services ubiquitously throughout its designated serving areas in western Missouri. The K.L.M. Telephone Company offers
broadband internet and data services utilizing digital subscriber line (DSL) technology. K.L.M. offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. This specific response is from the perspective of the K.L.M. broadband services that are offered within its designated serving areas that overlap with the GlenMartin’s Last Mile Stimulus Application in Vernon County, Missouri. K.L.M. advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

The GlenMartin application overlaps with 347 census blocks in which K.L.M. offers DSL and fixed wireless broadband services. In these 347 census blocks, K.L.M. provides broadband service to 90 residential customers and 3 business customers. Thus, the overlap area in the GlenMartin application is not unserved. Furthermore, K.L.M. offers its broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and K.L.M. advertises speeds that exceed 3 Mbps.

The GlenMartin stimulus application should be rejected for several reasons, which include but are not limited to:

1. GlenMartin applied for Stimulus dollars in areas (Census Blocks) that are not unserved.
2. The GlenMartin application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas K.L.M. currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.
3. GlenMartin proposes a wireless technology solution. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. GlenMartin is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc)
4. It is not apparent that GlenMartin has addressed the challenge of its application’s ability to be economically sustainable in areas that lack population density, and are already served by multiple broadband providers.
5. Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that K.L.M. has a resident work force, located within its designated serving areas in western Missouri, and it has a history of sustained employment.

Submitter: Mediacom Communications Corporation
Comment: A large number of households within 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.

-----Service Area: 6 Nevada 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: 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: 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: 6 Nevada Cedar

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.
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: 6 Nevada 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: American Broadband DSL

Comment: K.L.M. Telephone Company is an incumbent local exchange carrier (ILEC), which is authorized by the Missouri Public Service Commission (PSC) and the Federal Communications Commission (FCC) to provide advanced and reliable telecommunications services ubiquitously throughout its designated serving areas in western Missouri. The K.L.M. Telephone Company offers broadband internet and data services utilizing digital subscriber line (DSL) technology. K.L.M. offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. This specific response is from the perspective of the K.L.M. broadband services that are offered within its designated serving areas that overlap with the GlenMartin’s Last Mile Stimulus Application in Bates County, Missouri. K.L.M. advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

The GlenMartin application overlaps with 351 census blocks in which K.L.M. offers DSL and fixed wireless broadband services. In these 351 census blocks, K.L.M. provides broadband service to 271
residential customers and 39 business customers. Thus, the overlap area in the GlenMartin application is not unserved. Furthermore, K.L.M. offers its broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and K.L.M. advertises speeds that exceed 3 Mbps.

The GlenMartin stimulus application should be rejected for several reasons, which include but are not limited to:

1. GlenMartin applied for Stimulus dollars in areas (Census Blocks) that are not unserved.

2. The GlenMartin application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas K.L.M. currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.

3. GlenMartin proposes a wireless technology solution. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. GlenMartin is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc)

4. It is not apparent that GlenMartin has addressed the challenge of its application’s ability to be economically sustainable in areas that lack population density, and are already served by multiple broadband providers.

5. Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that K.L.M. has a resident work force, located within its designated serving areas in western Missouri, and it has a history of sustained employment.

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.”