

Broadband USA Applications Database

Applicant Name: Keystone Wireless LLC DBA Immix Wireless

Public Notice Submissions

-----**Service Area:** Central Pennsylvania - Keystone

Submitter: Tele-Media Company of Zion, L.L.C.

Comment: Tele-Media Company of Zion, LLC provides cable TV services including broadband and telephony in two areas of central Pennsylvania. 100% of one of those areas and 25% of the other area are included within the applicant's service area. We provide broadband service that meets or exceeds the definition of broadband in 100% of our service areas; accordingly, our areas are not unserved or 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.”

Submitter: CenturyLink

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

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

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

Submitter: CATV Service, Inc.

Comment: CATV Service, Inc. is a local company providing cable television, high speed Internet, and telephone services in a number of the communities included in the applicant's service area. Having been in business since 1953 and offered broadband Internet services since 2001, CATV Service has always

been committed to providing quality services at competitive rates. Significant investment through private funding has been made in the Company's private network in order to make broadband Internet service available to the residents and businesses located in the service footprint. As broadband is already being offered through our existing network, the service area is certainly not unserved. Also, considering the number of residents and businesses that are customers of CATV Service and the fact that broadband is also available through several other wired and wireless providers including the respective ILECs, it is highly questionable that the service area can be defined as underserved. It is our feeling that the applicant's proposal would only duplicate existing available services that have been funded by private investment. As such, we would request and appreciate the full consideration in not recommending or approving the application.

Submitter: Utopian Wireless Corporation

Comment: Proprietary data regarding actual service provider broadband penetration in the proposed service area for this application demonstrates the area is already served by broadband options and therefore this application is ineligible for funding pursuant to the requirements of the Broadband Initiatives Program (BIP) and Broadband Technology Opportunities Program (BTOP).

Submitter: Service Electric Broadband Cable

Comment: Our cable coverage offers greater internet speeds at reasonable prices.

Coverage extends into many rural areas.

Submitter: Service Electric Cablevision Inc.

Comment: We believe this area is not underserved as defined by the NOFA. Service Electric offers a wide array of broadband speeds with top speeds at 15 Mbps. In addition many other cable, phone, and wireless companies all offer broadband speeds over 768k. Over 40% of our customers subscribe to our broadband internet and in the coming months a Docsis 3.0 network will be deployed to this region. Please visit our website for more info <http://www.secv.com>