Applicant Name: KeyOn Communications, Inc.

Public Notice Submissions

-----Service Area: Wisconsin

Submitter: LaGrant Connections, LLC

Comment: LaGrant Connections, LLC offers Digital Subscriber Line service in both LaFayette and Grant counties in WI at speeds equal to or exceeding 3 mg. The service is capable of being offered at every customer location in the city of Cuba City, the village of Belmont and in the adjacent rural areas of these communities.

Submitter: Amherst Telephone Company

Comment: Amherst Telephone Company has been serving the rural area of Eastern Portage County, Wisconsin within the Amherst, Polonia, and Rosholt Exchanges for 106 years. As the incumbent local exchange carrier and by NOFA definition, Amherst Telephone company is neither unserved nor underserved.

Due to the satisfaction of the definitions outlined in the NOFA, we feel this application should be found invalid and no ARRA funds made available to the applicants in this area.

Submitter: West Wisconsin Telcom Cooperative

Comment: West Wisconsin Telcom Cooperative, Inc. ("West Wisconsin") is the Incumbent Local Exchange Carrier in its service territory and had been providing essential and advanced telecommunications service since 1954. West Wisconsin was the first utility to provide Broadband services in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all households and businesses. West Wisconsin is currently upgrading its facilities based network to provide fiber to 100% of the households and businesses in the service territory. West Wisconsin has already deployed fiber to all medical institutions, public libraries and public schools in its service territory. Network upgrades have been partially funded by USDA-Rural Utility Development Program loan funds. West Wisconsin offers discounted bundles of equipment and service
such as voice, video and data to 100% of its customers. West Wisconsin is a member owned community-based employer, employing over 50 local residents.

Submitter: Richland-Grant Telephone Cooperative

Comment: RESPONDENTS SUMMARY

Richland-Grant Telephone Cooperative, Inc. (“Richland-Grant”) is the Incumbent Local Exchange Carrier in its service territory and had been providing essential and advanced telecommunications service since 1951. Richland-Grant was the first utility to provide Broadband services in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all households and businesses. Richland-Grant continues to invest in upgrading its facilities based network to provide fiber to the households and businesses in the service territory. Richland-Grant is in the process of deploying fiber to all medical institutions, public libraries and public schools in its service territory. Network upgrades have been partially funded by USDA-Rural Utility Development Program loan funds. Richland-Grant offers discounted bundles of equipment and service such as voice, video and data to 100% of its customers. Richland-Grant is a member owned community-based employer, employing over 14 local residents.

WIRELESS SPECTRUM

N/A

COMMENTS

Currently Richland-Grant provides Broadband to over 40% of all households in the service territory. With the current requests for broadband services Richland-Grant anticipates that over 30% of its customers will be receiving 10 or more Mbps of the various services by the end of 2010. Broadband service pricing depends on the amount of Internet Access and other advance services requested by the customers. Because Richland-Grant offers 3 Mbps of Broadband speed to 100% of its customers the service area in not an Underserved area.
Submitter: Nsighttel Wireless, LLC (dba "Cellcom")

Comment: Cellcom makes available access to facilities based wireless broadband service at greater than the minimum broadband transmission speed as described in NOFA to more than 50% of the households in the existing service area mapped below. The map confirms that Cellcom's existing service area overlaps with the proposed funded service area, Wisconsin of KeyOn Communications, Inc.

Submitter: Reedsburg Utility Commission

Comment: The Reedsburg Utility Commission ("RUC") is an incumbent Broadband provider in the City of Reedsburg, Wisconsin and has been providing essential and advanced telecommunications services since 2003. RUC was the first utility to provide Broadband services in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all the households and businesses in the service territory. RUC has deployed fiber to all medical institutions, public libraries, public schools and to 100% of the households and businesses. RUC offers discounted equipment and service packages with services such as voice, video, and data to 100% of its customers. RUC is a local municipality which employs approximately 40 local residents. Because RUC offers 3 Mbps of Broadband speed to 100% of the households in the service area, the service area should not qualify as an Underserved Area.

Submitter: Charter Communications

Comment: Charter Communications (‘Charter’), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant’s request in the proposed under-served 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: Farmers Independent Telephone Company

Comment: Farmers Independent Telephone Company has been serving the city and area of Grantsburg in rural Wisconsin for 102 years. Farmers Telephone is the incumbent local exchange carrier and by the NOFA definition is neither unserved nor underserved. Due to the satisfaction of the definitions outlined in the NOFA, no ARRA funds should be available to the applicant in this area.

Submitter: Lakeland Communications, Inc.
Comment: Lakeland Communications, Inc. is a rural telecommunications company located in North-Western Wisconsin. This response is submitted to present the service offerings of Lakeland Communications which meet the NOFA definition of broadband service across its entire area. Lakeland Communications proudly offers a variety of broadband service offerings to meet the needs of its rural community. Lakeland is confident it meets the needs of residents because we have daily face to face contact where we discuss those needs. Our customers are our neighbors, employees, and friends. Lakeland is a community-based company and is one of the top employers in our area. We support our local community in many ways including financial support, local employment, volunteer work and community appreciation events. To serve each unique need Lakeland Communications offers broadband via two different delivery systems which allows for customized service when needed.

Submitter: Vernon Telephone Cooperative, Inc

Comment: KeyOn Communications, Inc. has applied for broadband stimulus funds in our serving area. Since the area that KeyOn Communications, Inc. has applied in does not meet the determination of Unserved or Underserved as defined in the Notice of Funds Availability (NOFA), we feel that their application is invalid. Vernon Telephone Cooperative is a provider of broadband services in this area

Submitter: Merrimac Communications Merr.com

Comment: Merr.com’s service area is not underserved according to NOFA's definition. 1. more than 50% have access. 2 Mer.com has advertised 3 mbps downstream. 3. More than 40% of HH subscribe to broadband service.

Submitter: Amery Telcom, Inc. dba Northwest Communications

Comment: Amery Telcom, Inc. has been serving the rural areas of Amery, Clayton, and Deer Park in Polk and St Croix counties in Wisconsin for over 100 years. As the incumbent local exchange carrier and by NOFA definition, Amery Telcom is neither unserved nor underserved.
100% of our service area is served with broadband meeting the definition of 768Kbps. We have 42% subscribership in our area. We offer 3 Mg in 100% of our service territory.

Due to the satisfaction of the definitions outlined in the NOFA, we feel this application should be found invalid and no ARRA funds made available to the applicant in this area.

Submitter: MH Telecom, LLC

Comment: Upon reviewing the BIP/BTOP applications posted by RUS and NTIA I have the following comments as they affect the MH Telecom, LLC serving the city of Dodgeville, Argyle, Avoca, Belmont, Benton, Boscobel, Cuba City, Darlington, Eastman, Gratiot, Hazel Green, Highland, Mazomanie, Montfort, Mount Zion, Muscoda, North Freedom, Platteville, Prairie du Chien, Shullsburg, Stuben, and Wauzeke with DSL service and Barneveld, Hollandale, Ridgeway, Mineral Point and rural Dodgeville with a wireless broadband service.

MH Telecom, LLC dba MHTC is a facility based CLEC serving 100% of the City of Dodgeville with DSL at 5 meg service. In addition we have fiber connectivity to the schools, hospital, library, and, city and county offices. DSL in the other areas that MH Telecom serves where we are not facilities based is dependent on the local ILEC loop length, but 3 meg service can be provided to approximately 80 to 85% of the subscribers. In the wireless broadband areas there is a wide range of penetration because of the local terrain.

The City of Dodgeville, our facility based service area does not meet the “Unserved or Underserved” definition as defined in the Notice of Funds Availability (NOFA). Some of the rural areas that we serve present a real challenge to provide an economically feasible solution. MH Telecom did not participate in the application because based on the definition of “rural” we need to be more than 50 miles from a population of 20,000, because of Madison, WI and Dubuque, IA we would not qualify for a rural grant.

Therefore we are objecting to the following applicants who have indentified the City of Dodgeville and other areas we currently serve in whole or in part as a potential for funding:

Submitter: Manawa Telephone Company, Inc.

Comment: Manawa Telephone Company has been serving the areas of Manawa and Ogdensburg in Waupaca County, Wisconsin for over a century. Manawa Telephone Company is the incumbent local exchange carrier and by the NOFA definition of broadband, Manawa is neither unserved nor
underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this area.

**Submitter:** Western Wisconsin Communications, LLC

**Comment:** Western Wisconsin Communications, a subsidiary of Tri-County Communications Cooperative offers highspeed broadband in the areas specified on the enclosed map. The speeds meet the definitions defined in the NOFA. Due to the satisfaction of the definitions and the availability of multiple providers in this area, no ARRA funds should be awarded to the applicant in the serving area.

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

**Comment:** Citizens has been providing service to remote and rural areas for over 57 years and was one of the first to provide broadband service to rural America. We also continue to be a leader in providing advanced communications services by providing broadband service to over 99 percent of its service areas and is building for the future by making significant investment in a fiber network that will ultimately benefit 100 percent of our customer.

**Submitter:** Baldwin Telecom Inc.

**Comment:** In 100% of the BTI serving area (see map) has had high-speed internet for several years. BTI offers 1Mb to 6Mb both in packages and a stand alone product offering.

**Submitter:** Siren Telephone Company

**Comment:** Siren Telephone Company serves the city of Siren and surrounding area in rural Wisconsin. Siren Telephone is the incumbent local exchange carrier and offers high speed broadband to its customers. Siren Telephone meets the definitions outlined in the NOFA for broadband and is neither unserved nor underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this area.

**Submitter:** Hillsboro Telephone Co., Inc.

**Comment:** KeyOn Communications, Inc. has applied for broadband stimulus funds in our serving area. Since the area that KeyOn Communications has applied to serve does not in our opinion meet the determination of Unserved or Underserved as defined in the Notice of Funds Availability (NOFA), we feel that their application should be invalidated.
Within our service area there are 5 broadband competitors providing a range of service levels from the 768Kb’s to greater than 5Mb’s. Besides Verneau Networks (Hillsboro Telephone’s subsidiary) the list includes Community Antenna Systems, Verizon Wireless, US Cellular and Wild Blue Communications. The coverage of these 5 competitors, are able to render services to 100% of the available households within our service area.

Our service area contains several facilities, both public and private, where access to the Internet is available for free. Also our area also is home to a large population of people that shun technology due to religious beliefs and have no desire for service at any level.

Utilizing the current technologies that we have deployed 100% of the households and businesses in our service area have access to a minimum of 5Mb’s and 97% have access to 12 to 47Mb’s and in some cases as we expand our fiber to the home as much as 100Mb’s.

Submitter:  Marquette Adams Telephone Cooperative Inc.

Comment:  Marquette-Adams Telephone Cooperative, Inc. (“Marquette-Adams”) is the Incumbent Local Exchange Carrier in its service territory and has been providing essential and advanced telecommunications service since 1951. Marquette-Adams was the first utility to provide Broadband services in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all households and businesses in its service territory. Marquette-Adams is currently upgrading its facilities based network to provide fiber to 100% of the households and businesses. Marquette-Adams has already deployed fiber to all medical institutions, public libraries and public schools in its service territory. Network upgrades have been partially funded by USDA-Rural Utility Development Program loan funds. Marquette-Adams offers discounted equipment and service packages for services such as voice, video and data to 100% of its customers. Marquette-Adams is a member owned community-based employer, employing over 19 local residents. Because Marquette-Adams offers 3 Mbps of Broadband speed to 100% of its customers the service area does not qualify as an Underserved Area, and does not qualify for any BIP or BTOP funding.

Submitter:  Somerset Telephone Co dba Northwest Communications

Comment:  Somerset Telephone Company has been serving the rural area of Somerset in St Croix county Wisconsin for 90 years. As the incumbent local exchange carrier and by NOFA definition, Somerset Telephone Co. is neither unserved nor underserved.
100% of our service area is served with broadband meeting the definition of 768Kbps. We have 53% subscribership in our area. We offer 3 Mg in 100% of our service territory.

Due to the satisfaction of the definitions outlined in the NOFA, we feel this application should be found invalid and no ARRA funds made available to the applicant in this area.

Submitter: Spring Valley Telephone Company

Comment: Spring Valley Telephone Company ("Spring Valley") does provide 3 Mbps of Broadband downstream and 1 Mbps of upstream speeds to 100% of the customers in the Spring Valley service territory that is overlapped by the application of KeyOn Communications, Inc. Spring Valley has deployed fiber to the premise to 80% of the households and businesses in this territory. The remaining areas will be finished in 2010. The fiber network was funded by a USDA RUS Rural Development Loan. This area does not meet the definition of Underserved.

Submitter: Tri-County Communications Cooperative, Inc.

Comment: Tri-County Communications Coop. serves the communities of Eleva, Independence, Northfield, Pigeon Falls, Pleasantville and Strum in rural Wisconsin. Tri-County Communications is the incumbent local exchange carrier in these areas and by the NOFA definitions, Tri-County is neither unserved nor underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this service area.

Submitter: Clear Lake Telephone Company, Inc.

Comment: Clear Lake Telephone Company serves the rural area of Clear Lake, in Polk, Barren, Dunn, and St Croix counties in the State of Wisconsin. We offer high-speed broadband under our affiliate CLT Communications. As the incumbent local exchange carrier offering the defined speeds of broadband provided in NOFA, our area is neither unserved nor underserved. Due to the satisfaction of these definitions, we believe this application should not be awarded ARRA funds in this area.

Submitter: Chibardun Telephone Coop., Inc. & CTC Telcom, Inc.

Comment: Chibardun Telephone Coop., Inc. & CTC Telcom, Inc. dba Mosaic Telecom files comments to take challenge the underserved designation of its service area.
Submitter: Union Telephone Company

Comment: Union Telephone Company serves the cities of Almond, Coloma, Hancock, and Plainfield as well as the surrounding areas in rural Wisconsin. Union Telephone is the incumbent local exchange carrier and by the NOFA definition of broadband is neither unserved nor underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this service area.