Applicant Name: Spacenet Inc

Public Notice Submissions

-----Service Area: Montana

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 10% overlap of its coverage with the large land area PFSA based on households served.

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 none are applicable to this proposed funded service area in the areas 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, more than 40% subscription rate and advertising at least three megabits per second (3Mbs).

Submitter: Mid-Rivers Communications

Comment: As indicated on our response map, and likely the response maps of many other Montana Cooperative telecommunications providers, this Applicant's assumption that the entire state of Montana outside the "Big 6" cities is underserved is thoroughly inaccurate. Mid-Rivers Communications currently offers and advertises broadband speeds of at least 3 Mbps Downstream to the majority of the population of our service area, in many cases advertising up to 10 Mbps Downstream. We are also working to bring broadband to our remaining unserved areas (where only satellite services are available today) utilizing a recently approved Rural Utilities Service (RUS) loan. These areas are served, or will be served, utilizing reliable wireline (and in limited cases fixed wireless) technology that meets the NOFA requirements for broadband service.
Submitter: 3 Rivers Telephone Cooperative

Comment: This applicant’s proposed project covers approximately 26 of the exchanges served by 3 Rivers Telephone Cooperative. A large portion of the identified service area covers remote mountainous regions with little or no inhabitants or homes, including Wilderness and National Forest areas. We currently serve the exchanges of 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: Range Telepphone 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 Spacenet Inc.’s application for broadband funds support in Montana, their comments that the areas are unserved or underserved are not true. The areas Range serves that was applied for in their application have 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 its member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Spacenet Inc.’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 Montana. Range has 40+ employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.