Applicant Name: Internet America, Inc.

Public Notice Submissions

-----Service Area: Internet America

Submitter: Texas Mid-Gulf Cablevision, LP

Comment: Texas Mid-Gulf Cablevision provides broadband Internet service throughout Wharton, Texas. AT&T, Dish Network, and DirecTV also provide broadband Internet service in Wharton, Texas. There is no need to subsidize a fifth provider in the area.

Submitter: Mid-Coast Cablevision, LP

Comment: Mid-Coast Cablevision provides broadband Internet service throughout El Campo and Edna, Texas. AT&T, Dish Network, and DirecTV also provide broadband Internet service in El Campo. YK Communications, Dish Network, and DirecTV also provide broadband Internet service in Edna. There is no need to subsidize a fifth provider in these communities.

Submitter: Ganado Telephone Co., Inc.

Comment: Applicant is requesting funding to provide broadband services in areas that already have 100% coverage and significant take rates.

Submitter: Time Warner Cable Inc

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”
Submitter: CMA Communications

Comment: CMA Communications is the current broadband provider of a robust high speed internet service to many rural towns, including Sourlake, Jasper, Woodville, La Grange, Schulenburg, Weimar and Giddings, TX. Each of these towns are included in the proposed funded service area under the application submitted by Internet America. Our comments are intended to provide information that will assist in the review of this application. Our Public Response will include an accurate renderate of our current service areas, a summary of customers capable and actually receiving these products and an overview of product features.

CMA Communications has made a significant private investment to allow delivery of High Speed Internet service to many rural Texas communities. Further, we believe that funding this project would create a government-funded overbuild situation.

Submitter: LaWard Telephone Company

Comment: LaWard Telephone Company (LaWard) is capable of providing broadband at minimum speeds of up to at least 768kbps download and 200kbps upload to 100% of its subscribers in its local exchange territory area. LaWard is also capable of providing download speeds of at least 1.5mbps downstream to more than 95% of its customers in its local service area. It appears that Internet America's application overlaps parts of LaWard's southern local exchange area that includes the communities of Port Alto and Olivia and LaWard Telephone believes that its service area is neither unserved nor underserved.

Submitter: Bay City Cablevision, LP

Comment: Bay City Cablevision provides broadband Internet service throughout Bay City, Markham, and Van Vleck, Texas. Skyconnect, tisd, AT&T, Dish Network, and DirecTV also provide broadband Internet service to Bay City. YK Communications, Dish Network, and DirecTV also provide broadband Internet service to Markham. AT&T, Dish Network, and DirecTV also provide broadband Internet service to Van Vleck. There is no need to subsidize another provider for these areas.

Submitter: Livingston Telephone Company, Inc.

Comment: Livingston Telephone Company, Inc. provides comments on this application regarding the underserved designation of the proposed funded area.
Submitter: Industry Telephone Company

Comment: Industry Telephone Company provides this response to the Internet America application. The applicant’s unserved designation of its service area does not apply to the portion of its service area which includes Industry Telephone Company, which overlaps the applicant’s area. We provide broadband access to 100% of our existing service area.

Submitter: Texas Communications

Comment: Texas Communications provides high-Speed wireless Internet to the following counties in central Texas: Brazos, Robertson, Grimes, Burleson and Milam. The PNF in question would provide government funding to directly compete against our privately funded enterprise and increase competition in an already crowded marketplace.

Submitter: Reveille Broadband

Comment: Reveille Broadband owns and operates cable TV/Broadband systems in the City of Lexington (Lee County) Indian Lake and Lake Thunderbird (Bastrop County) and most of southern Burleson County including the City of Somerville. Reveille Broadband offers 3 Mbps download and 1.5 Mbps upload speeds to its Internet customers for a very competitive rate. It also offers VoIP and digital cable. Reveille Broadband has both City and State issued franchises to operate in these areas.

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: Cameron Telephone Company, L.L.C.
Comment: Cameron Telephone Company has been offering high speed broadband service throughout its exchanges for nine years. The area applied for by the ARRA applicant is served with 3 Mbps service.

Submitter: Colorado Valley Telephone Cooperative, Inc.
Comment: Colorado Valley Telephone Cooperative, Inc. (the Cooperative) and its subsidiary, Colorado Valley Communications (CVC) make broadband service available in the area indicated. The Cooperative makes service available using digital subscriber line (DSL) technology and CVC uses wireless technology to make broadband service available in the area indicated. The Cooperative and CVC are prepared to expand services beyond the current service area based upon customer demand and economic feasibility. CVC currently competes with 2 other major providers within this application area – one a provider of DSL service and the other a provider of cable modem service - in providing broadband access. This area does not meet the BIP/BTOP definition of unserved/underserved for last mile service.

Submitter: TISD, Inc.
Comment:

Submitter: Stelera Wireless, LLC
Comment: The applicant’s proposed service area does not qualify as unserved or underserved as defined by the BIP or BTOP programs. Stelera Broadband provides broadband access to the service area with peak speeds of 6-7 mbps. The proposed service area is served by Stelera Broadband a broadband
service provider which advertises and delivers broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area have access to terrestrial broadband service at greater than the minimum broadband transmission speed.

Submitter: Suddenlink Communications

Comment: This response conclusively demonstrates that Suddenlink and its competitors already offer robust broadband service within the mapped area of the applicant’s proposed funded service area and that this mapped area is neither unserved nor underserved. Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the “Existing Broadband Subscribers” section of this response; (3) a summary of the vendor and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.

Submitter: Eastex Telephone Cooperative, Inc.

Comment: Eastex Telephone Cooperative, Inc. is an ILEC providing reliable terrestrial broadband data service within portions of the proposed funding area. In Eastex’s many years of experience within this rural service territory, wireless services are unlikely to be able to provide reliable broadband service throughout the area due to the size and density of local pine trees.