Applicant Name: Diverse Datum, Inc.

Public Notice Submissions

-----Service Area: Proposed Diverse Datum Service Area

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: Blanca Telephone Company

Comment: Broadband service of at least 3 mbps in the subject grant area is already advertised and provisioned. Accordingly, the area is neither "underserved" nor "unserved" as defined by the NOFA. It is uneconomic for stimulus money to be used to overbuild existing broadband services. The NOFA seeks irrelevant information, fails to apply the standard required by the ARRA, requires commenters to
provide information without first publishing those requirements and procedures in the Federal Register, and awards stimulus grants based upon “presumptions” which are not found in the ARRA.

Submitter: Rye Telephone Company

Comment: Rye Telephone Company (RTC) has been providing high-quality communications services in the remote and rural communities of Rye, Colorado City and Kim, Colorado for 50 years. RTC has been offering broadband services since 2002 and can offer speeds up to 5 Mbps within its service areas.

In keeping with its long tradition of providing cutting-edge technologies, RTC utilizes a variety of broadband technologies, each tailored to specific local needs and geographical challenges. At considerable investment, RTC deployed a Fiber-to-the-Premise (FTTP) platform to serve the vast majority of its service areas.

RTC is a local company that helps anchor the communities it serves. It provides much-needed jobs, 24-7 customer service and local offices. Because of RTC’s advanced network, important community anchor institutions including local and state government, public safety agencies, healthcare facilities, schools and libraries now have broadband services. Due to RTC’s entrepreneurial spirit, its dedication to its customers and through a substantial investment in advanced network facilities, these rural southern Colorado communities enjoy the same level of service as offered in metropolitan areas.

Submitter: Beulahland Communications, Inc.

Comment: Beulahland Communications, Inc. provides broadband services at speeds greater than 768 KB to all customers requesting service in the SE corner of Custer County, CO along State Highway 165 from the Pueblo County Line to Fairview as shown on map submitted. This area has been served by Beulahland and its common control telephone company for over 50 years.

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 will provide broadband access to the service area with peak speeds of 9-10 mbps in the next 6 months. The town of Alamosa will be served by Stelera Broadband, a broadband service provider under the RUS Broadband Loan program. Stelera plans to advertise and deliver broadband transmission speeds in excess of 3 mbps downstream. Over 50% of the households in the proposed service area will soon have access to terrestrial broadband service at greater than the minimum broadband transmission speed. The area does not qualify as unserved because the number of households lacking access to broadband is less than 90% based on Stelera research.