

Broadband USA Applications Database

Applicant Name: University of Arkansas for Medical Sciences

Public Notice Submissions

-----**Service Area:** Arkansas Telehealth & Oversight Management Network

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Mountain View Telephone Company

Comment: Mountain View Telephone Company is respectfully filing this response to the UAMS Public Notice Filing mainly in order to make sure the record of this territory is accurate. Mountain View Telephone Company provides last and middle mile services in this area and will be pleased to work with UAMS to further their goals to "improve access to and quality of broadband in healthcare, research, and education delivery at 402 community anchor institutions."

This area is not unserved or under-served. Mountain View Telephone Company, an existing RUS borrower, provides broadband at a variety of speeds up to and including 10Mbps in all areas. These speeds are offered throughout the territory, including the section UAMS has mapped as "unserved."

Submitter: Allegiance Communications, LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Suddenlink Communications

Comment: In its application, the University of Arkansas made a significant effort to carve served areas from its proposed funded service area. Unfortunately, the effort was not perfect and some areas already served with broadband services are included. This response presents one such area that is served by Suddenlink Communication. There may be additional served areas that have been identified as either underserved or unserved. The agency should make clear in any award made as the result of this application that the funds should be expended only in truly unserved and underserved areas. 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: Yelcot Telephone Co., Inc.

Comment: Yelcot Telephone Company is respectfully filing this response to the UAMS Public Notice Filing mainly in order to make sure the record of this territory is accurate. Yelcot Telephone Company provides last and middle mile services in this area and will be pleased to work with UAMS to further their goals to "improve access to and quality of broadband in healthcare, research, and education delivery at 402 community anchor institutions." This area is not unserved or under-served. Yelcot Telephone Company, an existing RUS borrower, provides broadband at a variety of speeds up to and including 10Mbps in all areas. These speeds are offered throughout the territory, including the section UAMS has mapped as "unserved."

Submitter: NewWave Communications

Comment: NewWave has a 53 percent broadband market penetration and provides 100 percent of that area with 3 MG service. We serve 38 percent of Clay County and 4 percent of Green County. In addition, according to data compiled by the Media Business Corporation, an independent research firm, NewWave and its digital subscriber line competitors serve over 40% of homes passed in this particular market. As a result, this market is adequately serviced by NewWave and its competitors.

Submitter: Ritter Communications

Comment: E. Ritter Telephone Company and its affiliates, E. Ritter Communications, Inc., Tri-County Telephone Company and Ritter Cable Corporation (collectively, "Ritter Communications") respond to this Public Notice Filing regarding the application filed by the University of Arkansas for Medical Services ("UAMS"). In its application, UAMS seeks to "improve access to and quality of broadband in healthcare, research, and education delivery at 402 community anchor institutions." Ritter Communications provides last mile and middle mile services in these areas, and welcomes the opportunity to work with UAMS in reaching these noble goals. The companies must ensure, however, that proposed funded service areas in UAMS' application which overlap the service areas of the Ritter Communications' companies are properly classified. Accordingly, Ritter Communications files this response demonstrating that because the companies currently provide broadband services to their entire service areas, including where community anchor institutions are located, these areas cannot be considered "unserved." Further, in these areas, the companies have advertised speeds of at least 3 Mbps in these areas so these areas cannot be considered "underserved."

Submitter: Seneca Goodman and Ozark Telephone Companies

Comment: Seneca, Goodman, and Ozark Telephone Companies, an RUS/RDUP telecom loan program borrower, currently provides broadband internet service access to all establishments located within their certificated service areas. The lowest advertised broadband internet service package is 1 Mb downstream with 3 Mb internet service also being advertised. I.P. Video services are available throughout all exchange areas, further demonstrating and utilizing the capacity of the established broadband facilities. The Seneca Goodman and Ozark Telephone Companies have provided dedicated fiber access for broadband service transmission to schools located within their exchange areas, and in 2004 began providing broadband internet access in their certificated exchange areas of rural southwest Missouri, Northwest Arkansas, and Northeast Oklahoma. Currently several fixed broadband facility and nationwide wireless providers are competing for broadband services within the exchange areas of Seneca, Goodman, and Ozark Telephone Companies.

Submitter: Allegiance Communications

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Allegiance Communications,LLC

Comment: Allegiance Communications (Allegiance) currently provides a wide array of broadband offerings within the proposed funded service area. Allegiance has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. Allegiance's service area already provides for "sufficient access to broadband service to facilitate rural economic development", as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. Allegiance's opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

Submitter: Clinton\ Quitman Cable Inc.

Comment: Quitman Cable provides High Speed Internet Service at lower than average prices for speeds over 3Mbps in the most populated area that the applicant says is unserved and/or underserved. If the applicant supplies service to the outbound area that we serve, they have no way of blocking wireless internet service to the areas that we serve. We are planning to expand our service area in the near future, but equipment cost and economic slowdowns have forced us to wait a short time. This applicant receiving funds for this area would not benefit enough homes that do not already have access to over a 3Mbps high speed internet service.