Applicant Name: North Florida Broadband Authority

Public Notice Submissions

-----Service Area: NFBA_FL_GSA

Submitter: GTC, Inc.

Comment: GTC, Inc. ("GTC") is responding to this Public Notice Filing regarding North Florida Broadband Authority’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is a large area of 9,130 square miles in north Florida covering several counties including all of Taylor County. GTC is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 91% of the overlap with the applicant’s proposed funded service area, as outlined in the response area map. The proposed funded service area overlaps completely with GTC’s incumbent service area, and the applicant claims that the area is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the proposed funded service area which overlaps with GTC is “underserved” is simply not true.

Submitter: AT&T

Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed service area, which may be part of a larger application and project, satisfies the unserved and underserved eligibility requirements.

Additional information regarding other broadband service providers' currently operating in the service area may be needed in order to make a reasonable analysis or a conclusive determination.

Submitter: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.
Submitter:  CenturyLink

Comment:  CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years.

CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers.

The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter:  Windstream

Comment:  Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in 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 underserved.
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 “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Nefcom

Comment: Northeast Florida Telephone Company (NEFCOM) demonstrates that it provides broadband service to 98.9% of its service area, which is encompassed in the proposed funded Service Area in the North Florida Broadband Authority application; that no interconnection point identified in the proposed project and no part of the proposed project that terminates in NEFCOM’s service area qualifies as unserved or underserved for Last Mile projects; and Last Mile areas to be served identified in the application that overlap NEFCOM’s service area are served with broadband service by NEFCOM. Further, NEFCOM demonstrates that in addition to providing its own last mile broadband services, NEFCOM has middle mile broadband facilities providing sufficient capacity to support the provision of broadband service to end users.

As demonstrated, 98.9% of households in NEFCOM’s service area are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from NEFCOM; 98.9% of the households in the
proposed funded Service Area that overlaps NEFCOM’s service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; NEFCOM advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout its service area.