Applicant Name: GlenMartin, Inc.

Public Notice Submissions

-----Service Area: 24 GM F Schuyler

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by GlenMartin, Inc. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. GlenMartin, Inc. incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

-----Service Area: 24 GM F Macon

Submitter: Chariton Valley Telephone Corporation

Comment: Chariton Valley Telephone Corporation currently provides broadband access capability to 100% of the households within the area of the proposed funded serving area indicated “PFSA” challenged area. Chariton Valley Telephone Corporation a rural CLEC that has been serving the area for some time. In the challenged PFSA they currently offer Wireless broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 16% of the households with Broadband. Chariton Valley Telephone Corporation offers speeds of over 3Mbps throughout this area. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

Submitter: Utopian Wireless Corporation
**Comment:** Proprietary data regarding actual service provider broadband penetration in the proposed service area for this application demonstrates the area is already served by broadband options and therefore this application is ineligible for funding pursuant to the requirements of the Broadband Initiatives Program (BIP) and Broadband Technology Opportunities Program (BTOP).

**Submitter:** Chariton Valley

**Comment:** Chariton Valley Telephone currently provides broadband access capability to 100% of the households within the area of the proposed funded serving area indicated “PFSA” challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving 338 broadband customers within this area or 33% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. All wireline customers are above 768Kbps. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

**Submitter:** CenturyLink

**Comment:** The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. 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 over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  24 GM F Pike

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.”
Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM’s territory is neither unserved nor underserved.

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. 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 over 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 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.”
-----Service Area: 24_GM_F_Lawrence

Submitter: Choctaw Telephone

Comment: Choctaw Telephone Company demonstrates that the area Glen Martin Inc. proposes to serve which overlaps Choctaw Telephone’s service area does not meet the criteria to categorize an area as remote or unserved and does not meet all of the criteria which categorize an area as underserved.

As demonstrated, 80% of households in Choctaw Telephone’s service area, including those areas which are part of Applicant’s proposed funded service area, are able to readily subscribe upon request and have access to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from Choctaw Telephone and, therefore, no part of this overlapping area is unserved or underserved on the basis of access to broadband service. In addition, Choctaw Telephone demonstrates that the rate of broadband subscribership for households in Choctaw Telephone’s service area is significant. In addition, Choctaw Telephone is less than 50 miles from the limits of a non-rural area and, therefore, it is not remote.

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.”

-----Service Area: 24 GM F Shelby

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: Mark Twain Rural Telephone Company

Comment: The application submitted by GlenMartin, Inc. contains inaccurate and incomplete information and should be rejected, or in the alternative, amended appropriately. GlenMartin, Inc. incorrectly classifies a significant portion of the proposed service area that is currently being served by Mark Twain as unserved and / or underserved as defined by the NOFA. Mark Twain responds by providing evidence and supporting documentation to prove that these areas served by Mark Twain are in fact adequately served with copper, wireless and / or fiber optic facilities. All communities and all subscribers in the designated areas served by Mark Twain have access to adequate and affordable middle mile transport facilities as well as last mile broadband service that exceeds 3 Mbps. As such, the proposed service area contained in the application that is currently served by Mark Twain should not be eligible for funding according to the rules and regulations posted by NTIA and RUS.

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that
are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. 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 over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: 24_GM_F_Gasconade

Submitter: Fidelity Communications Co. and subsidiaries

Comment: Fidelity Telephone Co., a wholly-owned subsidiary of Fidelity Communications Co., is an ILEC providing telecommunications services in a portion of the Applicant's proposed funded unserved service area in Gasconade County, Missouri. Fidelity has provided quality service in rural exchanges since the 1940’s and has built a robust broadband network, providing DSL services since 2002 at current speeds up to 5 Mbps.
Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. 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 over 7 million access lines and 2.1 million broadband customers in 33 states.
Submitter: Boycom Cablevision Inc.

Comment: Boycom Cablevision Inc. currently offers download speeds in excess of 3 Mbps in its Butler, Wayne, Carter county systems. Boycom Cablevision Inc. is a borrower in the RUS Broadband loan program and currently has an upgrade project, loan # MO1102c in progress using the RUS loan program funding. The upgrade will cover its Butler county, Wappapello, Puxico, Fisk and Qulin MO service areas. Once completed it will allow high speed data services in excess of 10 Mbps Downstream and 3 Mbps Upstream.

-----Service Area: 24_GM_F_Mercer

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM’s territory is neither unserved nor underserved.

-----Service Area: 24 GM F Livingston

Submitter: Green Hills Telephone Corp, dba: Green Hills Co’s

Comment: • 100% of Green Hills’ service area has access to facilities based Broadband in excess of 768k down/200 up speeds.

• Green Hills’ advertises and provides multiple service speeds including an offering with 3 Meg down.
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: 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: Chariton Valley Telephone

Comment: Chariton Valley Telephone currently provides broadband access capability to 100% of the households within the area of the proposed funded serving area indicated “PFSA” challenged area. Chariton Valley Telephone is a rural ILEC that has been serving the area for some time. In the challenged PFSA they currently offer ADSL broadband and FTTH broadband data services. As of June 2009 they are serving broadband customers within this area or 100% of the households with Broadband. Chariton Valley Telephone offers speeds of over 3Mbps throughout this area. Due to customer choice within this area 100% of the total households have opted for access speed in access of 768Kbps. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as unserved and 3Mbps speeds are available throughout the challenge area.

-----Service Area: 24_GM_F_Stoddard

Submitter: Utopian Wireless Corporation

Comment: Proprietary data regarding actual service provider broadband penetration in the proposed service area for this application demonstrates the area is already served by broadband options and therefore this application is ineligible for funding pursuant to the requirements of the Broadband Initiatives Program (BIP) and Broadband Technology Opportunities Program (BTOP).

Submitter: NewWave Communications

Comment: NewWave serves this area with a 42% market penetration and 100% availability of 3 MG service. 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.

-----Service Area: 24_GM_F_Vernon
Submitter:  American Broadband DSL Metz exchange

Comment:  K.L.M. Telephone Company is an incumbent local exchange carrier (ILEC), which is authorized by the Missouri Public Service Commission (PSC) and the Federal Communications Commission (FCC) to provide advanced and reliable telecommunications services ubiquitously throughout its designated serving areas in western Missouri. The K.L.M. Telephone Company offers broadband internet and data services utilizing digital subscriber line (DSL) technology. K.L.M. offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. This specific response is from the perspective of the K.L.M. broadband services that are offered within its designated serving areas that overlap with the GlenMartin’s Last Mile Stimulus Application in Vernon County, Missouri. K.L.M. advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

The GlenMartin application overlaps with 347 census blocks in which K.L.M. offers DSL and fixed wireless broadband services. In these 347 census blocks, K.L.M. provides broadband service to 90 residential customers and 3 business customers. Thus, the overlap area in the GlenMartin application is not unserved. Furthermore, K.L.M. offers its broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and K.L.M. advertises speeds that exceed 3 Mbps.

The GlenMartin stimulus application should be rejected for several reasons, which include but are not limited to:

1. GlenMartin applied for Stimulus dollars in areas (Census Blocks) that are not unserved.

2. The GlenMartin application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas K.L.M. currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.

3. GlenMartin proposes a wireless technology solution. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. GlenMartin is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc).

4. It is not apparent that GlenMartin has addressed the challenge of its application’s ability to be economically sustainable in areas that lack population density, and are already served by multiple broadband providers.

5. Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that K.L.M. has a resident work force, located within its designated serving areas in western Missouri, and it has a history of sustained employment.
Service Area: 24_GM_F_Gentry

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

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.”

-----Service Area: 24_GM_F_Nodaway

Submitter: GVNW Consulting, Inc.

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM’s territory is neither unserved nor underserved.

Submitter: IAMO Telephone Co

Comment: 100% of our service area is covered by broadband including the rural areas not just the city area.

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. 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 over 7 million access lines and 2.1 million broadband customers in 33 states.

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.

-----Service Area: 24 GM F Scotland

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arabela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR
has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 10 Gigabits. These communities are served with a diversely routed fiber optic cable system that provides high reliability and resiliency from a potential fiber optic cable cut. Their existing fiber optic cable infrastructure and transport network electronics provide adequate transport facilities to serve all the needs of these communities today and into the future. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the GlenMartin, Inc. application. The public interest goals suggested by the proposed project are being accomplished using existing “middle-mile” infrastructure and thereby more efficient and will avoid the potential destabilizing effect of subsidized competition. These locations cannot be considered either “underserved” or “unserved”. The middle mile and last mile infrastructure deployed by NEMR and its affiliated companies currently provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.

-----Service Area: 24_GM_F_Bates

Submitter: American Broadband Rich Hill exchange DSL

Comment: K.L.M. Telephone Company is an incumbent local exchange carrier (ILEC), which is authorized by the Missouri Public Service Commission (PSC) and the Federal Communications Commission (FCC) to provide advanced and reliable telecommunications services ubiquitously throughout its designated serving areas in western Missouri. The K.L.M. Telephone Company offers broadband internet and data services utilizing digital subscriber line (DSL) technology. K.L.M. offers broadband services at speeds that meet and exceed the minimum download (768 Kbps) and upload (200 Kbps) speeds defined in the NOFA. This specific response is from the perspective of the K.L.M. broadband services that are offered within its designated serving areas that overlap with the GlenMartin’s Last Mile Stimulus Application in Bates County, Missouri. K.L.M. advertises broadband service alternatives that meet and exceed minimum download and upload speeds defined in the NOFA.

The GlenMartin application overlaps with 226 census blocks in which K.L.M. offers DSL and fixed wireless broadband services. In these 226 census blocks, K.L.M. provides broadband service to 246
residential customers and 41 business customers. Thus, the overlap area in the GlenMartin application is not unserved. Furthermore, K.L.M. offers its broadband service at speeds that exceed the NOFA minimums and exceed 3 Mbps, and K.L.M. advertises speeds that exceed 3 Mbps.

The GlenMartin stimulus application should be rejected for several reasons, which include but are not limited to:

1. GlenMartin applied for Stimulus dollars in areas (Census Blocks) that are not unserved.

2. The GlenMartin application is overly broad because it did not seek to perform validations of broadband penetration rates at the Census Block level, whereas K.L.M. currently provides, advertises, and tracks broadband penetration to the Census Block level within its designated serving areas.

3. GlenMartin proposes a wireless technology solution. Only Fiber-to-the-Premise solutions offer a long term future-proof solution for meeting the challenge of a rapidly increasing definition of minimum download and upload speeds. GlenMartin is only one of several wireless providers within the geography applied for that already offer data services over their wireless networks (Verizon, AllTel, Sprint, AT&T, etc)

4. It is not apparent that GlenMartin has addressed the challenge of its application’s ability to be economically sustainable in areas that lack population density, and are already served by multiple broadband providers.

5. Beyond initial network deployment, wireless infrastructure solutions have not demonstrated the ability to create sustained employment opportunities within the immediate service area. This is contrasted by the fact that K.L.M. has a resident work force, located within its designated serving areas in western Missouri, and it has a history of sustained employment.

-----Service Area: 24_GM_F_Lafayette

Submitter: Suddenlink Communications

Comment: This response conclusively demonstrates that Suddenlink and its competitors already offer broadband service within the mapped area of the applicant’s proposed funded service area and that this mapped area is not unserved. 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.

-----Service Area: 24 GM F Ralls

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

-----Service Area: 24_GM_F_Putnam

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

Submitter: Northeast Missouri Rural Telephone Company
Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to
connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City,
Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arbela, Rutledge and Luray, in
the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR
has a state-of-art SONET OC 192 transport network that connects all these communities and offers a
capacity of 10 Gigabits. These communities are served with a diversely routed fiber optic cable system
that provides high reliability and resiliency from a potential fiber optic cable cut. Their existing fiber
optic cable infrastructure and transport network electronics provide adequate transport facilities to
serve all the needs of these communities today and into the future. Further, NEMR is a member owner
of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of
Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas
City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection
on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the GlenMartin, Inc. application. The public interest
goals suggested by the proposed project are being accomplished using existing “middle-mile”
infrastructure and thereby more efficient and will avoid the potential destabilizing effect of subsidized
competition. These locations cannot be considered either “underserved” or “unserved”. The middle
mile and last mile infrastructure deployed by NEMR and its affiliated companies currently provides (and
will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of
these communities.

-----Service Area: 24_GM_F_NewMadrid

Submitter: Utopian Wireless Corporation

Comment: Proprietary data regarding actual service provider broadband penetration in the proposed
service area for this application demonstrates the area is already served by broadband options and
therefore this application is ineligible for funding pursuant to the requirements of the Broadband
Initiatives Program (BIP) and Broadband Technology Opportunities Program (BTOP).

Submitter: NewWave Communications
Comment: NewWave currently serves this area with 31% market penetration and 3 MG service available to all. 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.

-----Service Area: 24 GM F Lewis

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. 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 over 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: 24_GM_F_Pemiscott

Submitter: Utopian Wireless Corporation

Comment: Proprietary data regarding actual service provider broadband penetration in the proposed service area for this application demonstrates the area is already served by broadband options and therefore this application is ineligible for funding pursuant to the requirements of the Broadband Initiatives Program (BIP) and Broadband Technology Opportunities Program (BTOP).

-----Service Area: 24_GM_F_Caldwell

Submitter: Green Hills Telephone Corp, dba: Green Hills Co’s

Comment: • 100% of Green Hills’ service area has access to facilities based Broadband in excess of 768k down/200 up speeds.

• Green Hills’ advertises and provides multiple service speeds including an offering with 3 Meg down.

-----Service Area: 24_GM_F_Scott

Submitter: Utopian Wireless Corporation

Comment: Proprietary data regarding actual service provider broadband penetration in the proposed service area for this application demonstrates the area is already served by broadband options and
therefore this application is ineligible for funding pursuant to the requirements of the Broadband Initiatives Program (BIP) and Broadband Technology Opportunities Program (BTOP).

Submitter: Semo Communications, Incorporated

Comment: Semo Communications, Incorporated advertises and provides high speed data service in speeds of up to 8 mbps download and 768 kbps upload in the proposed funded service area.

-----Service Area: 24 GM F Clark

Submitter: Northeast Missouri Rural Telephone Company

Comment: Northeast Missouri Rural Telephone Company (NEMR) offers middle mile services to connect the communities of Unionville, Livonia, Worthington, Martinstown, Lemons, Pollock, Green City, Green Castle, Winigan, Milan, Novinger, Kirksville, Queen City, Memphis, Arabela, Rutledge and Luray, in the counties of Adair, Putnam, Sullivan, Schuyler, Scotland and Clark all in the State of Missouri. NEMR has a state-of-art SONET OC 192 transport network that connects all these communities and offers a capacity of 10 Gigabits. These communities are served with a diversely routed fiber optic cable system that provides high reliability and resiliency from a potential fiber optic cable cut. Their existing fiber optic cable infrastructure and transport network electronics provide adequate transport facilities to serve all the needs of these communities today and into the future. Further, NEMR is a member owner of the 14 ILEC member Missouri Network Alliance (MNA) network. This network covers much of Missouri and connects NEMR by this state-of-art fiber network and the other owners into the Kansas City Metro area where it connects with major Internet providers. NEMR has a 90 Mb data connection on MNA to redundant Internet POPs in Kansas City.

Based on the above factors, RUS/NTIA must reject the GlenMartin, Inc. application. The public interest goals suggested by the proposed project are being accomplished using existing “middle-mile” infrastructure and thereby more efficient and will avoid the potential destabilizing effect of subsidized competition. These locations cannot be considered either “underserved” or “unserved”. The middle mile and last mile infrastructure deployed by NEMR and its affiliated companies currently provides (and will continue to provide) highly reliable, state-of-the-art services to the businesses and residents of these communities.
-----Service Area: 24_GM_F_Cooper

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.

-----Service Area: 24_GM_F_Harrison

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM’s territory is neither unserved nor underserved.

-----Service Area: 24 GM F Marion
Submitter: Utopian Wireless Corporation

Comment: Proprietary data regarding actual service provider broadband penetration in the proposed service area for this application demonstrates the area is already served by broadband options and therefore this application is ineligible for funding pursuant to the requirements of the Broadband Initiatives Program (BIP) and Broadband Technology Opportunities Program (BTOP).

Submitter: US Cable of Coastal-Texas, L.P.

Comment: US Cable of Coastal-Texas, L.P. provides high speed broadband internet service in communities that are within the applicant's proposed service area.

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application's proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. 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 over 7 million access lines and 2.1 million broadband customers in 33 states.