Applicant Name:  Global Wireless Communications

-----------------------------------Public Notice Submissions-----------------------------------

-----Service Area:  Polk Central East

Submitter:  Bright House Networks, LLC

Comment:  In support of NTIA and RUS’ efforts to optimize the distribution of the scarce resources available under the ARRA Broadband NOFA, Bright House Networks is providing additional data related to this Applicant’s planned service areas. This application includes service areas which are not unserved nor underserved.

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.
-----Service Area: Hernando

Submitter: Bright House Networks, LLC

Comment: In support of NTIA and RUS’ efforts to optimize the distribution of the scarce resources available under the ARRA Broadband NOFA, Bright House Networks is providing additional data related to this Applicant’s planned service areas. This application includes service areas which are not unserved nor underserved.

-----Service Area: Pasco

Submitter: Bright House Networks, LLC

Comment: Applicant has multiple applications which alternately describe areas as served and underserved. All application service areas have advertised speeds greater than 3 MBPS and portions exceeding 40% penetration.

-----Service Area: BIP Lake

Submitter: The Home Town Network Inc

Comment: The Home Town Network Inc. (HTN) was founded in 1997 and has focused on providing Internet Access for Highlands County. We have evolved from Dial-up to DSL resale to Facilities based Fixed Wireless Service. In January of 2005 we began providing Fixed Wireless service and have steadily expanded our network to cover most of Highlands County with the exception of the extreme North and South (See service area map provided). We are an S corporation registered in the State of Florida and
have not received outside funding. All of our towers are currently capable of providing 3Mbps internet service to the end user and several towers are capable of end user speeds of 10Mbps. Our tower locations are densely located to provide almost 100% coverage. In addition we can provide custom solutions to meet the special needs of almost any organization or end user. Most internet customers in Highlands County have multiple choices for Broadband Internet service providers. The following is a list of other service providers who have significant coverage areas in Highlands County: Vistanet Wireless, Embarq DSL, Comcast Cable, and Several Cellular Providers. Collectively these providers including HTN have almost complete coverage to Highlands County residents and businesses. Highlands County has a large population of seasonal residents.

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: Florida Cable, Inc.

Comment: Florida Cable, Inc. currently provides full, robust broadband service in its service areas, including census tracts 301.01, 301.02, 301.03, 308.02, 309.02, 310.00, 311.00, 312.01, 313.01, 4.00, 23.01, 179.02, 428.00, 901.01, and 901.02. In addition, Florida Cable, Inc. advertises service of speeds above 3 Mbps throughout the Florida Cable Lake County Florida service area[s]. The Company also has direct knowledge of broadband availability from CENTURY/EMBARQ, Windstream, Comcast, Cox, AT&T and Brighthouse networks respectively throughout the service area. We pass over 50% of households, and have actual subscribership of over 40% of households in these our service areas. See attached maps, exhibits and responses. Therefore, the service areas identified in this response are NOT “underserved.”