Broadband USA Applications Database

**Applicant Name:** Homestead Development

_______________________Public Notice Submissions_______________________

-----**Service Area:** Crystal Cove I & II

**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.

-----**Service Area:** San Pedro
Submitter: Cox Communications, Inc.

Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Arizona with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.
Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

-----Service Area:  Candlewood

Submitter:  Direct Communications Cable

Comment:  Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain service areas. It appears that Homestead Development's application overlaps the company's area of service that includes the community of Montpelier. DCC is capable of providing cable and wireless broadband service to this community with speeds up to 6mbps downstream and 1mbps upstream and DCC believes that this area is neither unserved or underserved in broadband services.

-----Service Area:  Hysham

Submitter:  Range Telephone Cooperative

Comment:  Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 17% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today. This percentage is low because the applicants proposed area is in a mainly business district, limiting the number of residential households. Approximately 55% of Range residential households in the town of Hysham already subscribe to 3 mb or 1.5 mb service today.
The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Homestead Development Broadband application for broadband funds support in the Hysham, MT exchange, we already provide 1.5 mb or higher of DSL service to the households in the area designated by them.

Range is providing excellent communication services to this area. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years. We have fiber that goes right by this area already as well. We are currently in the process of updating our Central Office switching platform from digital to soft switch which employs IP protocol.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Homestead Development comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area. Range has 2 employees that work out of that area and already reside in or very near to that area and service those customers professionally.

-----Service Area:  Big Timber

Submitter:  Triangle Telephone Cooperative

Comment:  Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies.

Submitter:  Cable Montana, LLC
Comment: Cable Montana provides high speed data service with 3 meg download speeds in Big Timber, MT. Currently, the penetration rate is 21%. Triangle Telephone, a local telephone provider, also provides DSL high speed data service. The building that Homestead Development wants to build to could take our service and Cable Montana would be willing to negotiate a rate for the account.

-----Service Area: Livingston

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.

-----Service Area: Teton View
Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant's PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.

Submitter: KeyOn Communications

Comment: KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

Submitter: Qwest

Comment: As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Homestead Development for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: Parkside

Submitter: Cox Communications, Inc

Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Arizona with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5
percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

-----Service Area:  Pleasant Valley
**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of Homestead Development for funding for an area represented as “underserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----Service Area: Forsyth I & II

**Submitter:** Cable Montana, LLC

**Comment:** Cable Montana provides high speed data service with 3 Meg download speeds to Forsyth, Montana. Range Telephone, the local telephone providers, also provides DSL high speed data services in Forsyth. We compete daily for market share. The building that Homestead Development wants to build to could take our service and Cable Montana would be willing to negotiate a rate for the account.

**Submitter:** Range Telephone Cooperative

**Comment:** Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range’s service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range’s serving area subscriber households and business locations are capable of 3mb service today. Approximately 80% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant’s proposed funded service area that overlaps Range’s service area in Montana is not unserved or underserved as represented in the applicant’s proposal.

With respect to the Homestead Development Broadband application for broadband funds support in the Forsyth, MT exchange, we already provide 1.5 mb or higher of DSL service to the households in the
area designated by them. In fact, both of their establishments they are requesting for stimulus funds are very nearby our headquarters building.

Range has been providing excellent communication services to this area for over 10 years. Range used RUS loan funds and internal funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years. We have fiber that goes right by this area already as well. We are currently in the process of updating our Central Office switching platform from digital to softswitch which employs IP protocol. The customers in the rural areas of the Forsyth exchange already have access to fiber to the home technology. It was our first venture into that new technology and the customers who have it love it.

Range is very sensitive to it member/owner’s needs and we have focused the majority of our efforts on improving broadband services to them. Homestead Development comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area. Range has over 36 employees that work out of that area and already reside in or very near to that area and service those customers professionally.

-----Service Area: Baltray

Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.

Submitter: Safelink Internet
Comment: This area is already covered by 5 last mile service providers.

-----Service Area: Kacy Meadows

Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.

Submitter: Safelink Internet

Comment: This area is already covered by 4 last mile service providers.

-----Service Area: Brenchley Donegal Main Street

Submitter: DigitalBridge Communications Corp

Comment: DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.