Broadband USA Applications Database

**Applicant Name:** Oklahoma Telephone & Telegraph, Inc.

_____________________________Public Notice Submissions____________________________

-----Service Area: OTT

**Submitter:** Cross Wireless L.L.C.

**Comment:** Cross Wireless, LLC, has been offering broadband speed data service to its subscribers for over 5 years. The area applied for by the ARRA applicant, which falls within the wireless service area is served with high speed internet broadband service.

**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: Canadian Valley Telephone Company

Comment: Canadian Valley Telephone Company (“Canadian Valley”) is an RUS borrower and provides broadband access capability to 100% of the households and businesses within its service territory, and specifically, its territory that overlaps the applicant’s proposed funded service area (“PFSA”). Canadian Valley provides four (4) broadband internet service plans, including a plan with downstream speeds of 3Mbps and maintains a 43% broadband subscribership for the PFSA. Currently, 67% of Canadian Valley’s residential broadband customers subscribe to an enhanced broadband plan, which include a 960Kbps plan and a 1.5Mbps plan. Approximately 30% these of enhanced service subscribers have ordered the 1.5Mbps service. Canadian Valley continues to invest in its broadband network and will soon offer an IPTV service to 100% of its service territory. Additionally, Canadian Valley will be upgrading its upstream speeds from 512Kbps to 1Mbps and is planning a FTTH deployment in its service territory. Canadian Valley’s broadband internet service offerings are priced competitively as is apparent from Canadian Valley’s high subscriber penetration rates. The portion of the "PFSA" that encompasses Canadian Valley’s serving territory does not meet the criteria of unserved or underserved.

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.