Broadband USA Applications Database

Applicant Name: Hilbert Communications, LLC

_______________________ Public Notice Submissions ______________________

-----Service Area: Service Area 3

Submitter: Nsighttel Wireless, LLC (dba "Cellcom")

Comment: Cellcom makes available access to facilities based wireless broadband service at greater than the minimum broadband transmission speed as described in NOFA to more than 50% of the households in the existing service area mapped below. The map confirms that Cellcom's existing service area overlaps with the proposed funded service area, Service Area 3 of Hilbert Communications, LLC.

Submitter: Charter Communications

Comment: Charter Communications ("Charter"), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant’s request in the proposed under-served service area would create an overlap in Charter’s service area. Charter’s response includes the necessary information to validate the overlapping condition as a result of this applicant’s request.

-----Service Area: Service Area 1

Submitter: Cochrane Cooperative Telephone Company

Comment: Cochrane Cooperative Telephone Company ("Cochrane") is the Incumbent Local Exchange Carrier in its service territory and has been providing essential and advanced telecommunications services since 1905. Cochrane was the first utility to provide Broadband service in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all households and businesses. Cochrane is currently upgrading its facilities based network to provide fiber to 100% of the households and businesses in the service territory. Cochrane has already deployed fiber to all medical institutions, public libraries, and public schools in its service territory. Network upgrades have been partially funded by USDA-Rural Utility Development Program loan funds. Cochrane offers
discounted equipment and services packages with services such as voice, video, and data to 100% of its
customers. Cochrane is a member owned community based employer, employing 6 full time local
residents. Cochrane also outsources engineering, regulatory compliance, cost consultants, legal and
contracts out large construction projects which we believe equates to another 5 employee equivalents.
Because Cochrane offers 3Mbps of Broadband speed to 100% of the households in its service territory
and over 40% of the households are receiving that service, the area does not qualify as an Underseved
Area.

**Submitter:** Tri-County Communications Cooperative

**Comment:** Tri-County Communications Cooperative has serves the rural community surrounding
Gilmanton in Buffalo County Wisconsin. Tri-County Communications is the incumbent local exchange
carrier and by the NOFA definitions, this area is neither unserved nor underserved. Due to the
satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this service area.

**Submitter:** Chippewa Valley Cable

**Comment:** Chippewa Valley Cable is a subsidiary of Nelson Telephone Cooperative and offers high
speed broadband in the area indicated on the enclosed map. The speeds offered meet the definition of
broadband provided in the NOFA. There are other providers in this same area. Due to the satisfaction
of the definitions, this area is neither unserved nor underserved and no ARRA funds should be made
available to the applicant in this area.

**Submitter:** Charter Communications

**Comment:** Charter Communications (‘Charter’), a broadband service provider, has invested capital to
provide a full range of Broadband services, including High Speed Internet services, in this service area.
The applicant’s request in the proposed under-served service area would create an overlap in Charter’s
service area. Charter’s response includes the necessary information to validate the overlapping
condition as a result of this applicant’s request.

**Submitter:** Nelson Telephone Cooperative

**Comment:** Nelson Telephone Cooperative has been serving the areas of Arkansaw, Durand, Gilmanton
and Nelson in Buffalo County Wisconsin since 1949. Nelson Cooperative is the incumbent local
exchange carrier in this area and by the NOFA definition of broadband our area is neither unserved nor
underserved. Due to the satisfaction of these definitions we believe no ARRA funds should be made
available to the applicant in this area.
Submitter: Frontier Communications of Mondovi, LLC

Comment: A portion of the applicant's territory is already served by the respondent. 3MG speed or higher is available and advertised.

-----Service Area: Service Area 2

Submitter: MH Telecom, LLC dba MHTC

Comment: Upon reviewing the BIP/BTOP applications posted by RUS and NTIA I have the following comments as they affect the MH Telecom, LLC serving the city of Dodgeville, Argyle, Avoca, Belmont, Benton, Darlington, Gratiot, Highland, Montfort and Shullsburg with DSL service and Barneveld, Hollandale, Ridgeway, Mineral Point and rural Dodgeville with a wireless point to point broadband service.

MH Telecom, LLC dba MHTC is a facility based CLEC serving 100% of the City of Dodgeville with DSL at 5 meg service. In addition we have fiber connectivity to the schools, hospital, library, and, city and county offices. DSL in the other areas that MH Telecom serves where we are not facilities based is dependent on the local ILEC loop length, but 3 meg service can be provided to approximately 80 to 85% of the subscribers. In the wireless broadband areas there is a wide range of penetration because of the local terrain.

The City of Dodgeville, our facility based service area does not meet the “Unserved or Underserved” definition as defined in the Notice of Funds Availability (NOFA). Some of the rural areas that we serve present a real challenge to provide an economically feasible solution. MH Telecom did not participate in the application because based on the definition of “rural” we need to be more than 50 miles from a population of 20,000, because of Madison, WI and Dubuque, IA we would not qualify for a rural grant.

Therefore we are objecting to this applicant who has indentified the City of Dodgeville and other areas we currently serve in whole or in part as a potential for funding.

Submitter: LaGrant Connections, LLC

Comment: LaGrant Connections, LLC offers Digital Subscriber Line service in both Lafayette and Grant counties in WI at speeds equal to or exceeding 3 mg. The service is capable of being offered at every
customer location in the city of Cuba City, the village of Belmont and in the adjacent rural areas of these communities.

Submitter: Marquette-Adams Telephone Cooperative, Inc

Comment: Marquette-Adams Telephone Cooperative, Inc. (“Marquette-Adams”) is the Incumbent Local Exchange Carrier in its service territory and has been providing essential and advanced telecommunications service since 1951. Marquette-Adams was the first utility to provide Broadband services in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all households and businesses in its service territory. Marquette-Adams is currently upgrading its facilities based network to provide fiber to 100% of the households and businesses. Marquette-Adams has already deployed fiber to all medical institutions, public libraries and public schools in its service territory. Network upgrades have been partially funded by USDA-Rural Utility Development Program loan funds. Marquette-Adams offers discounted equipment and service packages for services such as voice, video and data to 100% of its customers. Marquette-Adams is a member owned community-based employer, employing over 19 local residents. Because Marquette-Adams offers 3 Mbps of Broadband speed to 100% of its customers the service area does not qualify as an Underserved Area and does not qualify for any BIP or BTOP funding.

Submitter: Manawa Telephone Company, Inc.

Comment: Manawa Telephone Company has been serving Manawa and Ogdensburg in Waupaca County, Wisconsin for over a century. Manawa Telephone is the incumbent local exchange carrier in these serving areas. By the NOFA definitions, these areas are neither unserved nor underserved. Due to the satisfaction of these requirements, no ARRA funds should be made available to this applicant in this area.

Submitter: Lemonweir Valley Telephone Company

Comment: Lemonweir Valley Telephone Company demonstrates that it provides broadband service throughout Juneau County which is encompassed in the proposed funded Service Area in the Hilbert Communications application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Lemonweir’s service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Lemonweir; 100% of the households in Lemonweir’s service territory within the proposed funded Service Area have access to facilities-based, terrestrial broadband service at greater than the minimum
broadband transmission speed as set forth in the definition of broadband; and the rate of broadband
subscribership for the proposed funded Service Area is greater than 40 percent of households.

Submitter: Coon Valley Farmers Telephone Company

Comment: Coon Valley Farmers Telephone Company has been serving the rural area of Coon Valley, WI, Vernon County (608-452), Chaseburg, WI, (608-483) Vernon County, and Stoddard, WI, Vernon County (608-457) for 102 years. As the incumbent local exchange carrier and by NOFA definition, Coon Valley Farmers Telephone Company is neither unserved nor underserved. Due to the satisfaction of the definitions outlined in the NOFA, we feel this application should be found invalid and no ARRA funds made available to the applicant in this area.

Submitter: Richland-Grant Telephone Cooperative, Inc.

Comment: RESPONDENTS SUMMARY

Richland-Grant Telephone Cooperative, Inc. (“Richland-Grant”) is the Incumbent Local Exchange Carrier in its service territory and had been providing essential and advanced telecommunications service since 1951. Richland-Grant was the first utility to provide Broadband services in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all households and businesses. Richland-Grant continues to invest in upgrading its facilities based network to provide fiber to the households and businesses in the service territory. Richland-Grant is in the process of deploying fiber to all medical institutions, public libraries and public schools in its service territory. Network upgrades have been partially funded by USDA-Rural Utility Development Program loan funds. Richland-Grant offers discounted bundles of equipment and service such as voice, video and data to 100% of its customers. Richland-Grant is a member owned community-based employer, employing over 14 local residents.

WIRELESS SPECTRUM

N/A
COMMENTS

Currently Richland-Grant provides Broadband to over 40% of all households in the service territory. With the current requests for broadband services Richland-Grant anticipates that over 30% of its customers will be receiving 10 or more Mbps of the various services by the end of 2010. Broadband service pricing depends on the amount of Internet Access and other advance services requested by the customers. Because Richland-Grant offers 3 Mbps of Broadband speed to 100% of its customers the service area in not an Underserved area.

Submitter: Amherst Telephone Company

Comment: Amherst Telephone Company has been serving the rural area of Eastern Portage County, Wisconsin within the Amherst, Polonia, and Rosholt exchanges for 106 years. As the incumbent local exchange carrier and by NOFA definition, Amherst Telephone Company is neither unserved nor underserved.

Due to the satisfaction of the definitions outlined in the NOFA, we feel this application should be found invalid and no ARRA funds made available to the applicant in this area.

Submitter: Nsighttel Wireless, LLC (dba "Cellcom")

Comment: Cellcom makes available access to facilities based wireless broadband service at greater than the minimum broadband transmission speed as described in NOFA to more than 50% of the households in the existing service area mapped below. The map confirms that Cellcom's existing service area overlaps with the proposed funded service area, Service Area 2 of Hilbert Communications, LLC.

Submitter: Charter Communications

Comment: Charter Communications (‘Charter’), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant’s request in the proposed under-served service area would create an overlap in Charter’s service area. Charter’s response includes the necessary information to validate the overlapping condition as a result of this applicant’s request.

Submitter: La Valle Telephone Cooperative, Inc
LaValle Telephone Cooperative, Inc. ("LaValle") is the Incumbent Local Exchange Carrier in its service territory and had been providing essential and advanced telecommunications service since 1956. LaValle was the first utility to provide Broadband services in the service territory and has built a wireline facilities based network to offer advanced Broadband services to 100% of all households and businesses. LaValle continues to invest in upgrading its facilities based network to provide fiber to the households and businesses in the service territory. LaValle has already deployed fiber to all medical institutions, public libraries and public schools in its service territory. Network upgrades have been partially funded by USDA-Rural Utility Development Program loan funds. LaValle offers discounted bundles of equipment and service such as voice, video and data to 100% of its customers. LaValle is a member owned community-based employer, employing over 14 local residents.

WIRELESS SPECTRUM

N/A

COMMENTS

Currently LaValle provides Broadband to over 40% of all households in the service territory. With the current requests for broadband services LaValle anticipates that over 30% of its customers will be receiving 10 or more Mbps of the various services by the end of 2010. Broadband service pricing depends on the amount of Internet Access and other advance services requested by the customers. Because LaValle offers 3 Mbps of Broadband speed to 100% of its customers the service area in not an Underserved area.

Submitter:  Vernon Telephone Cooperative, Inc.

Comment:  Hilbert Communications, LLC has applied for broadband stimulus funds in our serving area. Since the area that Hilbert Communications, LLC has applied in
does not meet the determination of Unserved or Underserved as defined in the Notice of Funds Availability (NOFA), we feel that their application is invalid. Vernon Telephone is a provider of broadband services in this area.

Submitter:  Hillsboro Telephone Co., Inc.

Comment:  Hilbert Communications, LLC has applied for broadband stimulus funds in our serving area. Since the area that Hilbert Communications has applied to serve does not in our opinion meet the determination of Unserved or Underserved as defined in the Notice of Funds Availability (NOFA), we feel that their application should be invalidated.

Within our service area there are 5 broadband competitors providing a range of service levels from the 768Kb’s to greater than 5Mb’s. Besides Verneau Networks (Hillsboro Telephone’s subsidiary) the list includes Community Antenna Systems, Verizon Wireless, US Cellular and Wild Blue Communications. The coverage of these 5 competitors, are able to render services to 100% of the available households within our service area.

Our service area contains several facilities, both public and private, where access to the Internet is available for free. Also our area also is home to a large population of people that shun technology due to religious beliefs and have no desire for service at any level.

Utilizing the current technologies that we have deployed 100% of the households and businesses in our service area have access to a minimum of 5Mb’s and 97% have access to 12 to 47Mb’s and in some cases as we expand our fiber to the home as much as 100Mb’s.

Submitter:  Union Telephone Company

Comment:  Union Telephone Company serves the cities of Almond, Coloma, Hancock, and Plainfield as well as the surrounding areas in rural Wisconsin. Union Telephone is the incumbent local exchange carrier and offers broadband that meets the NOFA definition of broadband.

-----Service Area:  Service Area 4

Submitter:  Charter Communications
Comment: Charter Communications (‘Charter’), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant’s request in the proposed un-served service area would create an overlap in Charter’s service area. Charter’s response includes the necessary information to validate the overlapping condition as a result of this applicant’s request.

-----Service Area: Service Area 5

Submitter: Nsighttel Wireless, LLC (dba "Cellcom")

Comment: Cellcom makes available access to facilities based wireless broadband service at greater than the minimum broadband transmission speed as described in NOFA to more than 50% of the households in the existing service area mapped below. The map confirms that Cellcom’s existing service area overlaps with the proposed funded service area, Service Area 5 of Hilbert Communications, LLC.

Submitter: Charter Communications

Comment: Charter Communications (‘Charter’), a broadband service provider, has invested capital to provide a full range of Broadband services, including High Speed Internet services, in this service area. The applicant’s request in the proposed under-served service area would create an overlap in Charter’s service area. Charter’s response includes the necessary information to validate the overlapping condition as a result of this applicant’s request.