Applicant Name: St. Louis Broadband, LLC

Submitter: Boycom Cablevision Inc.

Comment: Boycom Cablevision Inc. currently offers high speed data services in its Butler county, Piedmont, Greenville, Williamsville, and Wappapello systems in excess of 3 Mbps Downstream and up to 1 Mbps upstream. Boycom Cablevision Inc. is also a borrower in the RUS Broadband loan program and currently has an upgrade project in progress using the RUS loan program funding. The upgrade will cover its Butler county, Wappapello, Puxico, Fisk, and Quin MO service areas. Once completed, it will allow high speed data services in excess of 10 Mbps Downstream and 3 Mbps Upstream. Boycom Cablevision Inc. also has cable service in the Marble Hill, MO in Bollinger Co. This system is planned to be tied to our Puxico system via fiber to access high speed data.

Submitter: AT&T

Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed service area, which may be part of a larger application and project, satisfies the unserved and underserved eligibility requirements.

Additional information regarding other broadband service providers currently operating in the service area may be needed in order to make
a reasonable analysis or a conclusive determination.

**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: Dent

**Submitter:** Fidelity Communications Co. and subsidiaries

**Comment:** Fidelity is a CLEC, cable TV and internet service provider, who serves a portion of the Applicant’s proposed funded unserved and underserved service area within the city limits of Salem, Missouri and some surrounding areas of Dent County, Missouri. Fidelity has built a robust hybrid fiber/coax network providing a large number of subscribers with a package of voice, video and broadband services. Fidelity has provided broadband service via cable modems in this area since 2007 with current speeds up to 15 Mbps.

-----Service Area: Washington

**Submitter:** AT&T

**Comment:** AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed service area, which may be part of a larger application and project,
satisfies the unserved and underserved eligibility requirements.

Additional information regarding other broadband service providers' currently operating in the service area may be needed in order to make a reasonable analysis or a conclusive determination.

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 underserved proposed funded service area in Washington 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:  Century Link

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: Cape Girardeau

Submitter: Semo Communications, Inc.

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.

Submitter: AT&T
Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed service area, which may be part of a larger application and project, satisfies the unserved and underserved eligibility requirements. Additional information regarding other broadband service providers' currently operating in the service area may be needed in order to make a reasonable analysis or a conclusive determination.

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: 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: Madison

Submitter: AT&T

Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed
service area, which may be part of a larger application and project, satisfies the unserved and underserved eligibility requirements.

Additional information regarding other broadband service providers' currently operating in the service area may be needed in order to make a reasonable analysis or a conclusive determination.

**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.

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-----Service Area: Shannon

**Submitter:** Century Link

**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.

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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: Ellington Telephone Company, Inc.

Comment: Ellington Telephone Company provides DSL Broadband Service (at speeds of at least 768 Kbps downstream and 200 Kbps upstream) that is available to more than 95% of the households within the St. Louis Broadband, LLC proposed funded service area application overlapping Ellington Tel’s exchange area boundaries. Forty percent (40%) of Ellington Tel’s telephone service customers currently subscribe to Ellington Tel’s Broadband Service; and, the majority of Ellington Tel’s Broadband customers can receive downstream speeds of 3 Mbps or higher.

-----Service Area: St. Francois

Submitter: AT&T

Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant’s proposed service area, which may be part of a larger application and project, satisfies the unserved and underserved eligibility requirements. Additional information regarding other broadband service providers' currently operating in the service area may be needed in order to make a reasonable analysis or a conclusive determination.

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: Texas

Submitter: Cable America Missouri LLC

Comment: CableAmerica currently provides Broadband Internet speeds of 5.2Mbps download and 512Kbps upload.

Submitter: Century Link

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.

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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: Bollinger

Submitter: AT&T
Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed service area, which may be part of a larger application and project,
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----Service Area: Iron

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: Reynolds

Submitter: Century Link

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.

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-----Service Area: Perry

Submitter: AT&T

Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed service area, which may be part of a larger application and project, satisfies the unserved and underserved eligibility requirements. Additional information regarding other broadband service providers' currently operating in the service area may be needed in order to make a reasonable analysis or a conclusive determination.

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.