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: Hillsboro Telephone Co, Inc.

Comment: Wisconsin HighSpeed Broadband, LLC has applied for broadband stimulus funds in our serving area. Since the entire area that Wisconsin HighSpeed Broadband 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: MH Telecom, LLC

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, Boscobel, Cuba City, Darlington, Gratiot, Hazel Green, Highland, Mazomanie, Montfort, Muscoda, Platteville, Prairie du Chien, Shullsburg, with DSL service and Barneveld, Hollandale, Ridgeway, Mineral Point and rural Dodgeville with a wireless 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: 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: Vernon Telephone Cooperative, Inc.

Comment: Wisconsin HighSpeed Broadband, LLC has applied for broadband stimulus funds in our serving area. Since the area that Wisconsin HighSpeed Broadband, 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 Cooperative is a provider of broadband services in this area.

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:** CenturyLink

**Comment:** 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.

-----**Service Area:** Madison North

**Submitter:** Charter Communication

**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: Mt Horeb Telephone Company dba MHTC

Comment: Upon reviewing the BIP/BTOP applications posted by RUS and NTIA I have the following comments as they affect the Mt Horeb Telephone Company service area. Mt Horeb Telephone Company currently can provide DSL service to 100% of our service area in excess of 3 meg, in most locations 5 meg service is available. In addition we have fiber connectivity to the schools which allows for greater broadband capacities if desired. Our service area does not meet the “Unserved or Underserved” definition as defined in the Notice of Funds Availability (NOFA).

Therefore we are objecting to this applicant who has indentified the Mt Horeb Telephone Company service area as a potential for funding.

Submitter: Merrimac Communication Merr.com

Comment: Merr.com’s service area is not underserved according to NOFA's definition. 1. More than 50% have access. 2. Merr.com has advertised 3mbps downstream. 3. More than 40% of HH subscribe to broadband service.

Submitter: Marqueete-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: Reedsburg Utility Commission
Comment: The Reedsburg Utility Commission ("RUC") is an incumbent Broadband provider in the City of Reedsburg, Wisconsin and has been providing essential and advanced telecommunications services since 2003. RUC 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 the service territory. RUC has deployed fiber to all medical institutions, public libraries, public schools, and to 100% of all households and businesses in the service territory. RUC offers discounted equipment and service packages with services such as voice, video, and data to 100% of its customers. RUC is a local municipality which employs approximately 40 local residents. Because RUC offers 3 Mbps of Broadband speed to 100% of the households in the service area, the service area does not qualify as an Underserved Area.

Submitter: CenturyLink

Comment: 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.

-----Service Area: Wausau North

Submitter: Nsighttel Wireless, LLC(db "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, Wausau North of Wisconsin HighSpeed Broadband, 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:** CenturyLink

**Comment:** 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.