Applicant Name: Broadband Interstate Telecom Services

---------- Public Notice Submissions ----------

----- Service Area: Harrison County Region

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: Cellular South

Comment: Respondent, Cellular South, Inc., is a privately held Mississippi corporation and commercial mobile radio service provider which provides wireless telecommunications and broadband data services to its customers throughout the State of Mississippi, in western Tennessee, in southern Alabama, and northwest Florida. Respondent operates a broadband data transmission network in the State of Mississippi which utilizes Evolution Data Optimized (“EvDO”) technology which provides data transmission speeds up to a maximum of 3.0 mbps downstream and 1.0 mbps upstream. Respondent’s EvDO network is deployed in all or part of Applicant’s proposed service area and, therefore, no portion of Applicant’s proposed service area where Respondent’s EvDO service is deployed is unserved because Respondent’s EvDO service is accessible by 100% of the households in Respondent’s service area. Respondent notes that actual wireless coverage and broadband data transmissions may vary due to atmospheric conditions, customer equipment, and/or system limitation.
Service Area: Atlanta Region

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: Comcast Cable

Comment: Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

Submitter: Level 3 EON, LLC

Comment: Level 3 EON, LLC is filing this challenge based on the network services provided by Level 3 Communications, LLC. ("Level 3")

The overlapping service areas are drawn via the mapping tool. Level 3's fiber optic network infrastructure can support low speeds to support today's lower bandwidth needs and can scale to 40G and 100G to meet future bandwidth demands.

Absent some demonstrable cost or technology advantages, government funds should not be used to build along the same routes, and to the same communities, as existing and operating fiber optic networks. In the course of evaluating these projects, the Agencies should determine what other known network assets are already in place and operating, and should require applicants to take advantage of such networks. Level 3 has identified where its network is capable of delivering all or some significant
portion of the connectivity that the applicant proposes to deliver for a fraction of the cost proposed by the applicant.

Applicants should be required to demonstrate that they have exhausted commercial options involving use of existing infrastructure or services. In this regard, Level 3 notes that the Agencies’ rules make it clear that a capitalized capacity lease is eligible for funding under BTOP and BIP. The capital costs of deploying fiber is only a fraction of the total network cost. Deploying, operating and maintaining electronic gear makes up the bulk of cost associated with operating a new fiber optic network. Capitalized capacity leases allow multiple last-mile and middle mile providers to share these significant expenses on a flexible, scalable basis.

Using a capitalized capacity lease, a last mile provider could procure precisely the capacity it needs when needed to serve its community. This option scalable and allows service providers to secure smaller amounts of capacity as an initial matter, adding to the capacity only when demands require. It also adds to project sustainability by reducing both operating and maintenance costs. In addition, as long as Level 3’s network is in proximity, affordable hybrid fiber-microwave technologies can be used to establish interconnects back to the capitalized capacity leases. Multiple BTOP and BIP applicants can use identified capacity on a specific system, but capture the lower costs associated with the sharing of transport expenses.

Submitter: test
Comment: test

Service Area: Pearl River County Region

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.

-----Service Area: Macon County, AL Region

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.