Applicant Name: Edgenics Inc.

Public Notice Submissions

-----Service Area: MS-Crowder

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.

Submitter: Cable One, Inc

Comment: MS-Crowder (Batesville) - Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  AR-Turrell

Submitter:  Ritter Communications

Comment:  Ritter Communications provides this response to the filed application of Edgenics, Inc. Ritter, through its affiliate Ritter Cable, provides access to broadband service to 100% of its area which overlaps with the Edgenics Turrell, Arkansas PFSA. Because Ritter offers availability of broadband service to all of its company area, the designation of underserved does not apply to portions of the Turrell PFSA designation.
-----Service Area:  GA-Stillmore

Submitter:  Pineland Telephone Cooperative

Comment:  Pineland Telephone Cooperative (“Pineland”) is responding to this Public Notice Filing regarding Edgenics, Inc. application for broadband funding under the ARRA. The applicant’s proposed funded service area is located in south east Georgia and covers parts of Candler and Emanuel Counties. Pineland is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 100% of its service area as outlined in response area map in Candler and Emanuel Counties. For the proposed funded service area which overlaps with Pineland’ incumbent service area, the applicant claims that it is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the overlap with the proposed funded service area is “underserved” is not true.

-----Service Area:  MS-Duck Hill

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:

- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  MO-Dexter

Submitter:  Boycom Cablevision Inc.

Comment:  Boycom Cablevision Inc. is 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 Dudley, MO in Stoddard Co. This system is planned to be tied to our Fisk, MO system via fiber to access high speed data.
Submitter: NewWave Communications

Comment: NewWave Communications currently serves this area with a 51% market penetration. 3 MG or higher service is available to all. In addition, according to data compiled by the Media Business Corporation, an independent research firm, NewWave and its digital subscriber line competitors serve over 40% of homes passed in this particular market. As a result, this market is adequately serviced by NewWave and its competitors.

-----Service Area: TX-Willis

Submitter: Internet America, Inc.

Comment: Internet America currently provides access to high-speed Broadband Internet service to this Applicant’s proposed service area. As detailed in this response the Company believes the area should be re-categorized as served.

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.

-----Service Area: OK-Tatums

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: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural
economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

-----Service Area: MS-Metcalf

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: SC-Ridgeville

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined
broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  MS-Mound Bayou

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.

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:
Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

Submitter:  Mound Bayou Telephone and Communications, Inc.

Comment:  Mound Bayou Telephone and Communications is Mound Bayou's incumbent local exchange carrier and a Rural Utilities Service borrower whose fiber-fed network is capable of providing every business and residence in its certificated service area with broadband download rates of at least 3 megabits per second and upload rates of at least 768 kilobits per second.

-----Service Area:  MS-Cruger
Submitter: Cable One, Inc

Comment: MS-Cruger - Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95
Discounted bundles and promotional pricing are also available.

-----Service Area:  MS-Renova

Submitter:  DeltaTelephone Company Inc.

Comment:  Delta Telephone Company, Inc. (MS531), is a privately held telecommunications, video, and broadband data services to residents in its licensed service areas. Over the years Respondent has utilized funds, including Rural Utilities Service funds, to invest in its network to deploy fiber optic and other state of the art network technologies to provide the residents of its licensed service areas with robust and technologically advanced access to broadband services. Currently, Respondent provides access to broadband services to ninety percent (90%) of the residents in Respondent’s service area. Therefore, no portion of Respondent’s service area, including those which overlap with Applicant’s proposed service area, are unserved.

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.

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends
substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

**Commercial:**
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.
-----Service Area: MO-Carthage

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.

-----Service Area: MS-Duncan

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions
with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.
Service Area: MS-Artesia

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.

Submitter: Franklin Telephone Company, Inc.

Comment: Respondent, Franklin Telephone Company, Inc., is a privately held Mississippi corporation and rural incumbent local exchange carrier which provides telecommunications, video, and broadband data services to residents in its licensed service areas. Over the years Respondent has utilized funds, including Rural Utilities Service funds, to invest in its network to deploy fiber optic and other state of the art network technologies to provide the residents of its licensed service areas with robust and technologically advanced access to broadband services. Currently, Respondent provides access to broadband services to ninety-eight percent (98%) of the residents in Respondent’s service area. Therefore, no portion of Respondent’s service area, including those which overlap with Applicant’s proposed service area, are unserved.

Service Area: NC-Seaboard

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: AR-Garland town

Submitter: Southwest Arkansas Telephone Cooperative, Inc.

Comment: In the Garland and Washington exchanges, Southwest Arkansas Telephone Cooperative (SWAT) objects to the classification of the proposed area being designated as underserved. SWAT provides access to consumers of facilities-based broadband transmission speeds of at least 768 kilobits to 100% of the Proposed Funded Service Area. Swat advertises 3 megabit service in the proposed service area. Not only does SWAT provide services to this area, but two wireless broadband service providers also compete and advertise broadband services of speeds up to and over 5 megabits in the proposed funded service area. SWAT believes that, when coupled with the two broadband wireless providers, the penetration rate of broadband access is over 40% in the proposed service area. SWAT has invested extensively in the proposed funded service area to bring consumers the latest broadband technologies. Therefore this application should be rejected based on the above statements.

-----Service Area: SC-Port Royal

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: SC-Timmonsville
Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MS-Ruleville

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.
Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

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**Residential:**
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
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- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
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- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  NC-Morven
Submitter: Windstream

Comment: Windstream’s data conclusively establish that the proposed funded service area 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 households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Data regarding these broadband offerings, detailed below, establish that the proposed funded service area cannot meet all of the three prongs of the “underserved area” test.

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: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is
reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MS-Webb

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  SC-Blythewood

Submitter:  Time Warner Cable

Comment:  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”
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.”
-----Service Area: MS-Mayersville

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: GA-Smithville

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.

-----Service Area: GA-Buena Vista

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.

-----Service Area: TX-Whitewright

Submitter: Cable One, Inc.

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: MS-Crawford

Submitter: Franklin Telephone Company, Inc.

Comment: Respondent, Franklin Telephone Company, Inc., is a privately held Mississippi corporation and rural incumbent local exchange carrier which provides telecommunications, video, and broadband
data services to residents in its licensed service areas. Over the years Respondent has utilized funds, including Rural Utilities Service funds, to invest in its network to deploy fiber optic and other state of the art network technologies to provide the residents of its licensed service areas with robust and technologically advanced access to broadband services. Currently, Respondent provides access to broadband services to ninety-eight percent (98%) of the residents in Respondent’s service area. Therefore, no portion of Respondent’s service area, including those which overlap with Applicant’s proposed service area, are unserved.

Submitter: Cable One, Inc

Comment: MS-Crawford -

Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00

Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00

Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  AL-New Brockton

Submitter:  Time Warner Cable

Comment:  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area.  In addition, we advertise service of speeds above 3 Mbps throughout this service area.  We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%.  Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

Submitter:  CenturyLink

Comment:  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 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: TX-Prairie View

Submitter: Internet America, Inc.

Comment: Internet America currently provides access to high-speed Broadband Internet service to this Applicant’s proposed service area. As detailed in this response the Company believes the area should be re-categorized as served.

-----Service Area: NC-Maxton

Submitter: Windstream

Comment: Windstream’s data conclusively establish that the proposed funded service area 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 households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Data regarding these broadband offerings, detailed below, establish that the proposed funded service area cannot meet all of the three prongs of the “underserved area” test.
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: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: NC-Sprout Spring
Submitter: Windstream

Comment: Windstream’s data conclusively establish that the proposed funded service area 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 households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Data regarding these broadband offerings, detailed below, establish that the proposed funded service area cannot meet all of the three prongs of the “underserved area” test.

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: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is
reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MD-Milestown

Submitter: Gans Communications LP dba MetroCast Communications

Comment: Gans Communications, L.P. dba MetroCast Communications offers broadband service to 100% of the applicant’s proposed service area in St. Mary’s County, Maryland. MetroCast offers residential broadband transmission speeds in applicant's proposed service area up to 10Mbps downstream and 1 Mbps upstream, with MetroCast’s most highly-subscribed broadband service having a transmission speed of 7.0Mbps downstream and 512 kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 256 kbps upstream, with advertised offerings of up to 15Mbps downstream and 2 Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 45% of the households and businesses within the applicant's proposed service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including Verizon. According to an FCC report (http://www.fcc.gov/wcb/iatd/comp.html), as of June 30, 2008, ten other companies reported providing high-speed service to this service area.

Based on the information provided above, applicant’s proposed service area certainly does not meet the definition of “unserved” or “underserved” as those two terms are defined in the NTIA/RUS NOFA.

MetroCast has invested several million dollars of private capital to build an advanced fiber optic network to provide broadband services to St. Mary’s County, Maryland, which encompasses most of the applicant’s proposed service area in St. Mary’s County. Further details regarding the broadband services MetroCast provides in applicant’s proposed service area are provided below.

-----Service Area: MO-Bismarck

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: MS-Sledge

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**

- **Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00**
- **Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00**
- **Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00**
Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  NC-East Spencer

Submitter:  Time Warner Cable

Comment:  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  AR-Tollette

Submitter:  Walnut Hill Telephone Co.

Comment:  Walnut Hill Telephone Company demonstrates that the area Edgenics, Inc. proposes to serve which overlaps Walnut Hill Telephone’s service area does not meet all of the criteria which categorize an area as underserved.
As demonstrated, 100% of households in Walnut Hill Telephone’s service area, including those areas which are part of Edgenics, Inc.’s proposed funded service area, are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from Walnut Hill Telephone. Therefore, Edgenics, Inc.’s claim that this overlapping area is underserved due to limited access is incorrect. In addition, Walnut Hill Telephone demonstrates that the rate of broadband subscribership for [the part of the proposed funded service area which overlaps Walnut Hill Telephone’s service area] [its service area] is significant.

-----Service Area:  MS-Pace

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.

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends
substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable One’s current broadband service offerings are as follows:

**Residential:**
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

**Commercial:**
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.
-----Service Area: NC-Green Level

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: GA-Bronwood

Submitter: Main Street Broadband

Comment: Main Street Broadband (MSB) provides broadband internet service to households, businesses and anchor institutions.

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.

-----Service Area: SC-Manning

Submitter: Farmers Telephone Cooperative, Inc.

Comment: As demonstrated in the response, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the first criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds greater than 768 kbps downstream and 200 kbps upstream to more than 50% of the households located within the relevant area. Additionally, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the second criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds of at least 3 mbps or more in the relevant area. Although less than 40% of the aggregate households may not currently subscribe to FTC’s broadband service, it is nonetheless available to more than 99%.

Submitter: Time Warner Cable
Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: GA-Riceboro

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. We attach a representative sample of areas where the application overlaps our existing broadband deployment. This data is not exhaustive; the application may include other areas also currently served with broadband by CenturyLink or other providers. We will provide additional information on request if that will further assist the agency’s review.

CenturyLink also provides data showing broadband availability in local telephone exchanges within the proposed service areas. This includes areas served by CenturyLink and/or other broadband providers. This data further shows the applicant would duplicate and overlap existing broadband services in the proposed service areas.

-----Service Area: NC-Maysville
Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: NC-Dobbins Heights

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: TX-Rosser

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.”

-----Service Area:  NC-Hoffman

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: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”
-----Service Area:  MO-Wilson

Submitter:  Semo Communications, Incorporated

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.

-----Service Area:  GA-Jeffersonville

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.

Service Area:       NC-Kingstown

Submitter:       Time Warner Cable

Comment:       As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

Service Area:       MS-Crystal Springs

Submitter:       Telepak Networks Inc.

Comment:       Respondent, Telepak Networks, Inc., is a privately held Mississippi corporation and competitive local exchange carrier which provides telecommunications, video and broadband data services to residents in its licensed service areas. Respondent operates a broadband transmission network which runs from Jackson, Mississippi, to Memphis, Tennessee, to New Orleans, and throughout the State of Mississippi. Respondent also operates fiber-to-the-home networks in Crystal Springs, Inverness, and Roxie Mississippi as well as certain residential developments in the State of Mississippi.
-----Service Area: LA-Maringouin

**Submitter:** Spillway Communications

**Comment:** Spillway Communications provides high speed cable modem service with speeds of up to 6 mbps down and 3 mbps up in and around the community of Mannagouin, Louisiana.

-----Service Area: MS-Tutwiler

**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.

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The
Cable one’s current broadband service offerings are as follows:

Residential:
Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: OK-Lima

Submitter: @Link Services LLC
**Comment:** @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbs by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.

The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.

@Link has included copies of advertisements for service within the proposed funded service area.

@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.

-----**Service Area:** MS-Summit
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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00

Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  MO-Lilbourn

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:  MS-Moorhead

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.

**Submitter:** Cable One, Inc.

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**

- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00
Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: OK-Castle

Submitter: Central Oklahoma Telephone Co.

Comment: Central Oklahoma Telephone Company has been offering broadband speed data service to subscribers for 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service.

-----Service Area: GA-Dawson

Submitter: Windstream

Comment: Windstream’s data conclusively establish that the proposed funded service area 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 households in the proposed
funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Data regarding these broadband offerings, detailed below, establish that the proposed funded service area cannot meet all of the three prongs of the “underserved area” test.

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.

-----Service Area: SC-Mayesville

Submitter: Farmers Telephone Cooperative, Inc.

Comment: As demonstrated in the response, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the first criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-
based terrestrial-delivered broadband service at speeds greater than 768 kbps downstream and 200 kbps upstream to more than 50% of the households located within the relevant area. Additionally, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the second criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds of at least 3 mbps or more in the relevant area. Although less than 40% of the aggregate households may not currently subscribe to FTC’s broadband service, it is nonetheless available to more than 99%.

-----Service Area:  MS-Beulah

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.

Submitter:  Cable One, Inc

Comment:  MS-Beulah (Cleveland) -

Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.
Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one's current broadband service offerings are as follows:

**Residential:**
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
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**Commercial:**
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
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- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: GA-Ray City
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.

-----Service Area: LA-Grand Coteau
Submitter: Allen's TV Cable Service, Inc.

Comment: Allen's TV Cable Service submits the following information in response to the proposed service funded area. Edgenics’s proposal includes areas currently served by Allen’s TV Cable and other providers for the broadband market, thus providing adequate availability and users within our service area. Allen’s began offering its rural markets high speed broadband Internet starting in 2001, with speeds already in excess of 3Mbps. Infrastructure already in place allows for both high speed cable modem services as well as FTTx advanced services in Allen’s wired markets. Response map depicts these areas as well as our current cable modem rate schedule delivered to all customers and residences within these service areas.

-----Service Area: AL-Pickensville

Submitter: CenturyLink

Comment: 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 7 million access lines and 2.1 million broadband customers in 33 states.
Comment: As demonstrated in the response, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the first criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds greater than 768 kbps downstream and 200 kbps upstream to more than 50% of the households located within the relevant area. Additionally, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the second criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds of at least 3 mbps or more in the relevant area. Although less than 40% of the aggregate households may not currently subscribe to FTC’s broadband service, it is nonetheless available to more than 99%.

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.
Submitter: Cable One, Inc

Comment: MS-Morgan City,

Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $26.00

Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $49.00

Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $59.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65

Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95

Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95

Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95

Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95
Discounted bundles and promotional pricing are also available.

-----Service Area: SC-Calhoun Falls

Submitter: West Carolina Rural Telephone Cooperative, Inc.

Comment: Edgenics Inc.’s application is not eligible to receive requested funds for the below-named service area because that portion of the proposed funded service is neither "unserved" nor "underserved," as those terms are defined in the Notice of Funds Availability issued on July 9, 2009.

As demonstrated in this response, Edgenics Inc.’s application should not be considered for funding for the relevant service area because the existing service provider for that portion of the proposed funded service area currently offers facilities based terrestrial-delivered broadband service at speeds greater than 768 Kbps downstream and 200 Kbps upstream to more than 50% of the households located within the relevant area.

As demonstrated in this response, Edgenics Inc.’s application should not be considered for funding for the relevant service area because the existing service provider for that portion of the proposed funded service area currently offers terrestrial broadband service at speeds of at least 3 Mbps or more in the relevant area.

-----Service Area: SC-Wellford

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: LA-Grambling

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.

-----Service Area: LA-St. Joseph

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.
-----Service Area: SC-McCormick

Submitter: West Carolina Rural Telephone Cooperative, Inc.

Comment: Edgenics Inc.’s application is not eligible to receive requested funds for the below-named service area because that portion of the proposed funded service is neither "unserved" nor "underserved," as those terms are defined in the Notice of Funds Availability issued on July 9, 2009.

As demonstrated in this response, Edgenics Inc.’s application should not be considered for funding for the relevant service area because the existing service provider for that portion of the proposed funded service area currently offers terrestrial broadband service at speeds exceeding 3 Mbps in the relevant area and, further, more than 40% of the households subscribe to broadband service.

-----Service Area: TX-Martindale

Submitter: Time Warner Cable Inc

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: LA-Natchez

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.

-----Service Area:  GA-Walthourville

**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:  SC-Clio
Submitter: MetroCast Communications of Mississippi, LLC

Comment: MetroCast Communications of Mississippi, LLC offers broadband service to 100% of the applicant’s proposed service area. MetroCast offers residential broadband transmission speeds in applicant’s proposed service area up to 10Mbps downstream and 1Mbps upstream, with MetroCast’s most highly-subscribed broadband service having a transmission speed of 7.0Mbps downstream and 512kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 512kbps upstream, with advertised offerings of up to 15Mbps downstream and 3Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 10% of the households and businesses within the applicant’s proposed service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including AT&T. According to an FCC report (http://www.fcc.gov/wcb/iadt/comp.html), as of June 30, 2008, 10 other companies reported providing high-speed service to this service area.

Based on the information provided above, applicant’s proposed service area certainly does not meet the definition of “unserved” or “underserved” as those two terms are defined in the NTIA/RUS NOFA.

MetroCast has invested several million dollars of private capital to build an advanced fiber optic network to provide broadband services to the City of Bennettsville, the Towns of Clio, Tatum and McColl, and other areas of Marlboro County which encompasses a material portion of the applicant’s proposed service area. Further details regarding the broadband services MetroCast provides in applicant’s proposed service area are provided below.

-----Service Area: MS-Gunnison

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.

Submitter:  Cable One, Inc

Comment:  MS-Gunnison - Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00

Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00

Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65

Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: MO-Verona

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: 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.

-----Service Area: NC-Elm City

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”
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.”
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.”
-----Service Area:  MS-Itta Bena

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

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:
Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

------Service Area:  SC-Estill

Submitter:  CenturyLink

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: OK-Choctaw

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

Submitter: @Link Services LLC

Comment: @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbs by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty-four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.

The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.

@Link has included copies of advertisements for service within the proposed funded service area.

@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.
-----Service Area: NC-Sedalia

Submitter: Time Warner Cable

Comment: The Respondent’s Summary New Language:

As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MO-Clarkton

Submitter: NewWave Communications

Comment: NewWave Communications currently provides service to this area with a 51% market penetration. 3 MG or higher is available to all.

-----Service Area: MS-Tchula
**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**

- **Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00**
- **Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00**
- **Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00**

**Commercial:**

- **Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65**
- **Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95**
- **Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95**
- **Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95**
- **Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95**
Discounted bundles and promotional pricing are also available.

-----Service Area: MO-Fruitland

Submitter: Semo Communications, Incorporated

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.

-----Service Area: OK-Okemah

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.”

-----Service Area: TX-Mineral Wells

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.

-----Service Area: LA-Tangipahoa
Submitter: Xfone USA, Inc.

Comment: Xfone USA, Inc. currently provides Broadband Services greater than 3 mbps download speed to the communities of Amite, Natalbany, Independence, Tickfaw, Hammond, and Ponchatoula, LA.

-----Service Area: MS-Maben

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.

Submitter: MetroCast Communications of Mississippi, LLC

Comment: MetroCast Communications of Mississippi, LLC currently offers video service to 100% of the applicant’s proposed service area and is in the process of investing private capital to upgrade its fiber optic network so it can offer broadband service to 100% of applicant’s proposed service area. This upgrade is expected to be completed by January 31, 2010. Upon completion of this upgrade, MetroCast will offer residential broadband transmission speeds in applicant’s proposed service area up to 10Mbps downstream and 1Mbps upstream. In MetroCast’s other services areas, its most highly-subscribed broadband service has a transmission speed of 7Mbps downstream and 512kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 512kbps upstream, with advertised offerings of up to 15Mbps downstream and 3Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including AT&T. According to an FCC report (http://www.fcc.gov/wcb/iatd/comp.html), as of June 30, 2008, 8 other companies reported providing high-speed service to this service area. Based on the information provided above, applicant’s proposed service area certainly does not meet the definition of “unserved”
or “underserved” as those two terms are defined in the NTIA/RUS NOFA. MetroCast has invested millions of dollars of private capital to build an advanced fiber optic network to provide broadband services to the communities it serves. Further details regarding the broadband services MetroCast will provide in applicant’s proposed service area are provided below.

-----Service Area: MS-Rolling Fork

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: GA-Talbotton

Submitter: Public Service Telephone Company

Comment: Edgenics, Inc. has submitted an application to place facilities to provide Broadband service to two areas located within the serving area of Public Service Telephone Company, headquartered in Reynolds, GA. These areas are Talbotton, and Geneva, GA both located in Talbot County. These areas are neither unserved or underserved. As demonstrated, 100% of households in PSTC’s service area are able to readily subscribe upon request to facilities-based, terrestrial broadband services at a minimum transmission speed of greater than 768 kbps downstream and 200 kbps upstream from PSTC; 100% of the households in PSTC’s 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; PSTC advertises broadband service at broadband transmission speeds of at least 3 megabits per second
downstream throughout its service area; and the rate of broadband subscribership in PSTC’s service area is greater than 40 percent of households.

-----Service Area: AL-Gordonville

Submitter: Hayneville Telephone Company, Inc.

Comment: Hayneville Telephone Company provides telecommunications and high-speed Internet services within the proposed service area of Gordonville, located in Lowndes County, Alabama, as well as Hayneville and Mosses. Hayneville Telephone Company provides service to all areas of Gordonville, Hayneville and Mosses at speeds of 3 MB or less. Gordonville, Hayneville and Mosses thus may not qualify as underserved areas. Further, AT&T provides telecommunications and broadband services at speeds of 3-6 MB or less as an incumbent local exchange carrier in portions of Lowndes County.

-----Service Area: TX-Old River-Winfree

Submitter: Internet America, Inc.

Comment: Internet America currently provides access to high-speed Broadband Internet service to this Applicant’s proposed service area. As detailed in this response the Company believes the area should be re-categorized as served.

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.

-----Service Area: MS-Hazlehurst

Submitter: Telepak Networks Inc.

Comment: Respondent, Telepak Networks, Inc., is a privately held Mississippi corporation and competitive local exchange carrier which provides telecommunications, video and broadband data services to residents in its licensed service areas. Respondent operates a broadband transmission network which runs from Jackson, Mississippi, to Memphis, Tennessee, to New Orleans, and throughout the State of Mississippi. Respondent also operates fiber-to-the-home networks in Crystal Springs, Inverness, and Roxie Mississippi as well as certain residential developments in the State of Mississippi.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable One’s current broadband service offerings are as follows:

Residential:
Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  GA-Marshalville

Submitter:  ComSouth Corporation

Comment:  The proposed funded service area of Edgenics located in the community of Marshallville may not meet the criteria for “Underserved.” The proposed funded service area of Edgenics overlaps the existing service territory of ComSouth Telenet and ComSouth is making broadband services available to households in approximately 7% of the proposed funded service area (PFSA). Although ComSouth does not cover the entire PFSA, Comsouth, along with other service providers in the area may be providing service to more than 40% of the households in the PFSA. In addition, Comsouth along with other service providers in the area may be making broadband service available to more than 50% of the PFSA. Furthermore, Comsouth advertises broadband services at speeds exceeding 3mbps.

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.

-----Service Area: NC-Creedmoor

Submitter: Time Warner Cable
Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: SC-Gray Court

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: Piedmont Rural Telephone Cooperative, Inc.

Comment: Piedmont Rural Telephone Cooperative, Inc. (PRTC) is an incumbent broadband provider in Laurens County, SC, an area covered by Edgenics, Inc.’s Gray Court broadband stimulus application. The PRTC Service Territory is an area served by PRTC and at least three other broadband service providers. PRTC itself provides universal broadband coverage to 100% of the potential subscribers in its Service Territory and provides broadband service to approximately 22% of those potential subscribers. PRTC has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher throughout its Service Territory. The combined penetration rate of PRTC and all other broadband providers should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

-----Service Area: AL-Gordon

Submitter: Knology Total Communications
Comment: The proposed funded service area of Edgenics, Inc. located in the communities of Columbia, Dothan and Gordon may not meet the criteria for “Underserved.” The proposed funded service area of Edgenics overlaps 100% of the existing service territory of Knology Total Communications, Inc. (KTC) and KTC has made available at least 1.5 Mbps down of existing broadband service to 100% of the households in the proposed funded service area (PFSA). Thus, Edgenics may not meet the criteria for “Underserved” because KTC is providing existing broadband service to more than 40% of the households in the PFSA, and has made broadband service available to more than 50% of the PFSA.

-----Service Area: LA-Boyce

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.

-----Service Area: MS-Yazoo City

Submitter: CYTEC Software Systems, Inc.

Comment: CYTEC provides wireless broadband services to the central business district and adjacent areas of Yazoo City, MS.
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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:
Residential:
Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: NC-Granite Quarry

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: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: NC-Princeville
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.

-----Service Area: MS-Arcola

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: LA-Franklin

Submitter: Cox Communications, Inc
Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Louisiana with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.
Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

-----Service Area:  GA-Sparta

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.

-----Service Area:  IL-Pontiac

Submitter:  Mediacom Communications Corporation

Comment:  The vast majority of households within applicant's proposed service area are currently served by at least two broadband service providers, including Mediacom and Maxwire. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant's proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up 20 Mbps. Approval of this application would result in duplicative broadband services and a waste of taxpayer dollars.

-----Service Area:  MS-Oakland

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable
systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:
Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  MS-Shaw

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.

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**

- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00
Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: NC-Sharpsburg

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.

-----Service Area: MO-St. James

Submitter: Fidelity Communications Co. and subsidiaries
**Comment:** Fidelity is a CLEC, cable TV and internet service provider, who serves a large portion of the Applicant's proposed funded underserved service area within the city limits of Rolla, Missouri and some surrounding areas of Phelps 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 since 2000 with current speeds up to 5 Mbps.

-----Service Area: MS-Lambert

**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.

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable
systems, current advertisements for residential and commercial broadband offerings, and subscriber
data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**

- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

**Commercial:**

- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----**Service Area:**  MS-Potts Camp

**Submitter:**  MetroCast Communication of Mississippi, LLC

**Comment:**  MetroCast Communications of Mississippi, LLC offers broadband service to approximately
80% of the applicant’s proposed service area passing approximately 90% of the households. MetroCast
offers residential broadband transmission speeds in applicant’s proposed service area up to 10Mbps
downstream and 1Mbps upstream, with MetroCast’s most highly-subscribed broadband service having a
transmission speed of 7.0Mbps downstream and 512kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 512kbps upstream, with advertised offerings of up to 15Mbps downstream and 3Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 10% of the households and businesses within the applicant's proposed service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including AT&T. According to an FCC report (http://www.fcc.gov/wcb/iatd/comp.html), as of June 30, 2008, 10 other companies reported providing high-speed service to this service area.

Based on the information provided above, applicant's proposed service area certainly does not meet the definition of “unserved” or “underserved” as those two terms are defined in the NTIA/RUS NOFA.

MetroCast has invested millions of dollars of private capital to build advanced fiber optic networks to provide broadband services in the communities it serves, including the City of Potts Camp and other areas of Marshall County which encompasses a material portion of the applicant’s proposed service area. Further details regarding the broadband services MetroCast provides in applicant's proposed service area are provided below.

-----Service Area:  FL-Mount Dora

Submitter:  CenturyLink

Comment:  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 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area:  SC-Livingston

Submitter:  TDS Telecom

Comment:  TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

-----Service Area:  SC-Awendaw

Submitter:  TDS Telecom

Comment:  TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

-----Service Area:  LA-Wilson

Submitter:  Trust Cable, Inc.
**Comment:** Trust Cable, Inc. advertises and provides high speed cable modem broadband services of up to 10 mbps downstream in Wilson, Louisiana and the surrounding area.

-----**Service Area:** MS-Jonestown

**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

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: AL-Lisman

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

Submitter: Pine Belt Cellular Inc. dba Pine Belt Wireless
Comment: Pine Belt Cellular, Inc., dba Pine Belt Wireless, has been offering broadband data service to its subscribers for 3 years. The area applied for by the ARRA applicant falls within the franchised, FCC licensed and fixed wireless service areas of Pine Belt Cellular, and is served with high speed internet broadband service.

-----Service Area: AL-Forkland

Submitter: Pine Belt Cellular Inc. dba Pine Belt Wireless

Comment: Pine Belt Cellular, Inc., dba Pine Belt Wireless, has been offering broadband data service to its subscribers for 3 years. The area applied for by the ARRA applicant falls within the franchised, FCC licensed and fixed wireless service areas of Pine Belt Cellular, and is served with high speed internet broadband service.

-----Service Area: SC-Andrews

Submitter: Farmers Telephone Cooperative, Inc.

Comment: As demonstrated in the response, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the first criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds greater than 768 kbps downstream and 200 kbps upstream to more than 50% of the households located within the relevant area. Additionally, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the second criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds of at least 3 mbps or more in the relevant area. Although less than 40% of the aggregate households may not currently subscribe to FTC's broadband service, it is nonetheless available to more than 99%.

Submitter: Time Warner Cable
Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: LA-LeCompte

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.

-----Service Area: OK-Luther

Submitter: @Link Services LLC

Comment: @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbs by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.
The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.

@Link has included copies of advertisements for service within the proposed funded service area.

@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.

-----Service Area:  MS-Doddsville

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.

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**

- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

**Commercial:**

- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  NC-Fairmont

Submitter:  Time Warner Cable

Comment:  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  SC-Lake City

Submitter:  Farmers Telephone Cooperative, Inc.

Comment:  As demonstrated in the response, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the first criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds greater than 768 kbps downstream and 200 kbps upstream to more than 50% of the households located within the relevant area. Additionally, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the second criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at
speeds of at least 3 mbps or more in the relevant area. Although less than 40% of the aggregate households may not currently subscribe to FTC's broadband service, it is nonetheless available to more than 99%.

**Submitter:**  Time Warner Cable

**Comment:**  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  IL-Rantoul

**Submitter:**  Conxxus, LLC

**Comment:**  When reviewing the Edgenics proposed map including Paxton, Illinois, pleased be advised that Conxxus, LLC. Currently provides service to the entire community. Conxxus runs FTTP through the entire town and the town should be classified as “served”.

-----Service Area:  NC-Cofield

**Submitter:**  Time Warner Cable

**Comment:**  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined
broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MD-Calvert Beach

Submitter: Gans Communications LP dba MetroCast Communications

Comment: Gans Communications, L.P. dba MetroCast Communications offers broadband service to 100% of the applicant’s proposed service area in St. Mary's County, Maryland. MetroCast offers residential broadband transmission speeds in applicant’s proposed service area up to 10Mbps downstream and 1 Mbps upstream, with MetroCast’s most highly-subscribed broadband service having a transmission speed of 7.0Mbps downstream and 512 kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 256 kbps upstream, with advertised offerings of up to 15Mbps downstream and 2 Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 60% of the households and businesses within the applicant's proposed service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including Verizon. According to an FCC report(http://www.fcc.gov/wcb/iatd/comp.html), as of June 30, 2008, ten other companies reported providing high-speed service to this service area.

Based on the information provided above, applicant’s proposed service area certainly does not meet the definition of “unserved” or “underserved” as those two terms are defined in the NTIA/RUS NOFA.

MetroCast has invested several million dollars of private capital to build an advanced fiber optic network to provide broadband services to St. Mary's County, Maryland, which encompasses most of the applicant’s proposed service area in St. Mary’s County. Further details regarding the broadband services MetroCast provides in applicant’s proposed service area are provided below.

-----Service Area: LA-Donaldsonville
**Submitter:** Cox Communications, Inc

**Comment:** Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Louisiana with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.
Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

-----Service Area:  NC-Navassa

Submitter:  Time Warner Cable  

Comment:  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  AL-Mosses

Submitter:  Hayneville Telephone Company, Inc.

Comment:  Hayneville Telephone Company provides telecommunications and high-speed Internet services within the proposed service area of Mosses, located in Lowndes County, Alabama. Hayneville Telephone Company provides service to all areas of Mosses at speeds of 3 MB or less. Mosses thus may not qualify as an underserved area. Further, AT&T provides telecommunications and broadband services at speeds of 3-6 MB or less as an incumbent local exchange carrier in portions of Lowndes County.
-----Service Area:  NC-Gibsonville

Submitter:  Time Warner Cable

Comment:  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  AL-Colony

Submitter:  International Broadband Electric Communications

Comment:  IBEC is deploying High Speed Service in this area via a RUS Rural Broadband Loan

Submitter:  Advanced Computer Solutions LLC DBA ACS Broadband

Comment:  Advanced Computer Solutions LLC DBA Advanced Broadband has provided broadband connectivity to Colony Alabama since September 2008. Using Motorola Canopy technology from a tower six miles away we pretty much cover this whole town.

-----Service Area:  MS-Glendora

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.

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

**Residential:**
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

**Commercial:**
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95  
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95  
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95  
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  AL-Union

Submitter:  CenturyLink

Comment:  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 7 million access lines and 2.1 million broadband customers in 33 states.
-----Service Area: LA-Pineville

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.

-----Service Area: GA-Kingsland

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

-----Service Area: LA-Bastrop

Submitter: NELA telephone

Comment: North East Louisiana Telephone Company provides broadband access capability to 100% of the households within the area of the proposed funded serving area indicated “PFSA” challenged area. North East Louisiana Telephone is a rural ILEC that has been serving the area for some time. In the
challenged PFSA they currently offer ADSL broadband services. As of June 2009 they are serving 27% of the households within this area with Broadband, although some of the access speeds are below 768Kbps. North East Louisiana offers speeds of 3Mbps throughout this area. Due to customer choice within this area 88% of the total households currently served have opted for access speed in access of 768Kbps. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as un-served and 3Mbps speeds are available throughout the challenge area.

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.

-----Service Area: AL-Yellow Bluff

Submitter: Pine Belt Cellular Inc. dba Pine Belt Wireless

Comment: Pine Belt Cellular, Inc., dba Pine Belt Wireless, has been offering broadband data service to its subscribers for 3 years. The area applied for by the ARRA applicant falls within the franchised, FCC licensed and fixed wireless service areas of Pine Belt Cellular, and is served with high speed internet broadband service.

Submitter: CenturyLink

Comment: 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 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: MO-Charleston

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: MS-Isola

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.

Submitter: Delta Telephone Company Inc

Comment: Delta Telephone Company, Inc. (MS531), is a privately held telecommunications, video, and broadband data services to residents in its licensed service areas. Over the years Respondent has utilized funds, including Rural Utilities Service funds, to invest in its network to deploy fiber optic and other state of the art network technologies to provide the residents of its licensed service areas with robust and technologically advanced access to broadband services. Currently, Respondent provides access to broadband services to ninety percent (90%) of the residents in Respondent’s service area. Therefore, no portion of Respondent’s service area, including those which overlap with Applicant’s proposed service area, are unserved.

-----Service Area: MO-Farmington

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: MS-Gloster
Submitter: Trust Cable of MS, Inc.

Comment: Trust Cable of MS, Inc. advertises and provides high speed cable modem broadband service, including advertised 3mbps service in Gloster, Mississippi and the surrounding area.

-----Service Area: GA-Eatonton

Submitter: James Cable LLC

Comment: James Cable provides 8Mb broadband service to the community of Eatonton, Georgia.

-----Service Area: GA-Screven

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.”

-----Service Area:  SC-Atlantic Beach

Submitter:  Horry Telephone Cooperative, Inc.

Comment:  The application filed by Edgenics is not eligible to receive requested funds for the below-named service area because that portion of the proposed funded service is not “underserved” nor “unserved,” as those terms are defined in the Notice of Funds Availability issued on July 9, 2009. Furthermore, as demonstrated in this response, Edgenics application is not eligible to receive requested funding for the relevant service area because the existing service provider for this area currently offers facilities-based, terrestrial-delivered broadband service at downstream speeds of 768 Kbps or greater to more than 50% of the households in its service area.
Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MS-Beauregard

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: NC-Lilesville

Submitter: Windstream

Comment: Windstream’s data conclusively establish that the proposed funded service area 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 households in the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Data regarding these broadband offerings, detailed below, establish that the proposed funded service area cannot meet all of the three prongs of the “underserved area” test.

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: Time Warner Cable
**Comment:** As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  MO-Fisk

**Submitter:** Boycom Cablevision Inc.

**Comment:** Boycom Cablevision Inc. currently offers high speed data services in it's Butler county 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, Loan # MO1102C, 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 Qulin MO service areas. Once completed it will allow high speed data services in excess of 10 Mbps Downstream and 3 Mbps Upstream.

-----Service Area:  OK-El Reno

**Submitter:** @Link Services LLC

**Comment:** @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbs by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.

The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.
@Link has included copies of advertisements for service within the proposed funded service area.

@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.

Submitter: Cox Communications Inc.

Comment: Cox Communications, Inc.(Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Oklahoma with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service
and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

Submitter: Pioneer Telephone Cooperative

Comment: Pioneer Telephone Cooperative, Inc. through its subsidiary Pioneer Long Distance, Inc. (PLDI), has been offering broadband speed data service to subscribers for over 10 years. The area applied for by the ARRA applicant, which falls within the telephone exchange boundary is served with high speed internet broadband service.

-----Service Area: TX-Taylor
Submitter: Time Warner Cable Inc

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: NC-Parmele

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.

-----Service Area: OH-Belle Valley

Submitter: Suddenlink Communications
Comment: This response conclusively demonstrates that Suddenlink and its competitors already offer broadband service within the mapped area of the applicant’s proposed funded service area and that this mapped area is not unserved. 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.

------Service Area: MS-Coahoma

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

Submitter: Cable One, Inc

Comment: MS - Coahoma - (Clarksdale) - Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.
Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard , Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  AL-McMullen
Submitter: CenturyLink

Comment: 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 7 million access lines and 2.1 million broadband customers in 33 states.

-----Service Area: MS-Belzoni

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: MS-Laurel

Submitter: Bay Springs Communications Inc.

Comment: Bay Springs Communications, Inc. (BSCI) is an existing Competitive Local Exchange Carrier (CLEC) within Jones County in the State of Mississippi since 2003. Portions of the BSCI area are proposed to be served by Edgenics Inc. in their ARRA Broadband Stimulus application.

BSCI currently advertises and provides broadband services, at speeds up to 3 Mbps to residential and up to 10 Gbps to business subscribers within the area proposed by this applicant. In addition, broadband service, at speeds greatly in excess of the minimum broadband speed defined by the ARRA NOFA is currently available, through the DSL plant of BSCI, to 100% of homes and businesses within the BSCI service territory. The area proposed to be served by the applicant contains 10,383 households according to the 2000 U.S. Census, of which 77 residential and business subscribers are already served by BSCI. For these reasons the applicant’s request for funding to overbuild areas already served by BSCI should be denied.

Submitter: Bay Springs Telephone Company, Inc.

Comment: Bay Springs Telephone Company, Inc. (BSTC) is an existing RUS Traditional Telephone Borrower and since 1923 has served as the existing Incumbent Local Exchange Company (ILEC) for 12 exchange areas within the rural counties of Jasper, Jones, Rankin Scott and Smith in the State of Mississippi, portions of which are proposed to be served by Edgenics Inc. in their ARRA Broadband Stimulus application.
BSTC currently advertises and provides broadband services, at speeds up to 3 Mbps to residential and up to 10 Gbps to business subscribers within the area proposed by this applicant. In addition, broadband service, at speeds greatly in excess of the minimum broadband speed defined by the ARRA NOFA is currently available, through the DSL and Fiber to the Home (FTTH) distribution plant of BSTC, to approximately 80% of homes and businesses within the BSTC service territory. The area proposed to be served by the applicant contains 10,383 households according to the 2000 U.S. Census, of which 77 residential subscribers are already served by BSTC. For these reasons the applicant’s request for funding to overbuild areas already served by BSTC should be denied.

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: SC-Eastover

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is
reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  AR-Twin Groves

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.”

-----Service Area:  MS-Greenwood

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.

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: TX-Lexington

Submitter: Reveille Broadband

Comment: Reveille Broadband has been providing cable TV, HDTV, Broadband Internet and VoIP to the City of Lexington and its residents for the past several years. Reveille Broadband competes for its customers with Verizon and wireless incumbent Cobalt. Reveille offers 3 Mbps download and 1.5 Mbps upload to its customers for a very competitive rate. Reveille Broadband’s franchise with the City expired last year and was replaced by a State of Texas issued franchise in June 2008.
-----Service Area: MS-Fayette

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: NC-Wade

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MS-Goodman

Submitter: Cable One, Inc
Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.
-----Service Area: NC-Rennert

Submitter: Time Warner Cable

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: OK-Purcell35

Submitter: @Link Services LLC

Comment: @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbs by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.

The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.

@Link has included copies of advertisements for service within the proposed funded service area.
@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.

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: Wichita Online Inc.

Comment: Wichita Online (WOI) currently provides a wide array of broadband offerings within the proposed funded service area. WOI has offered broadband services in excess of the 3 MB bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. WOI’s service area already provides for “sufficient access to broadband service to facilitate rural economic development”, as well as allows for choice of service providers through competing with Local Exchange Carriers, and allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through WOI, but several ILEC’s, Cable companies, and numerous mobile broadband service providers offer several choice to the subscriber. WOI’s opinion of the proposed funded service area is that of excess spending where funds could be better used in other portions of the country to deploy broadband service in accordance with the ARRA, NOFA and BIP/BTOP programs. Through funding the proposed service area, excessive competition will be created for all, which may create a short term economic boost, but have severe long term ramifications which may force service providers out of business.

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.

-----Service Area: MO-Malden

Submitter: NewWave Communications

Comment: NewWave Communications currently serves this area and offer 3 MG or higher service availability to all. In addition, according to data compiled by the Media Business Corporation, an independent research firm, NewWave and its digital subscriber line competitors serve 40% or higher of homes passed in this particular market. As a result, this market is adequately serviced by NewWave and its competitors.

-----Service Area: FL-Lake Placid

Submitter: The Home Town Network Inc

Comment: The Home Town Network Inc. (HTN) was founded in 1997 and has focused on providing Internet Access for Highlands County. We have evolved from Dial-up to DSL resale to Facilities based Fixed Wireless Service. In January of 2005 we began providing Fixed Wireless service and have steadily expanded our network to cover most of Highlands County with the exception of the extreme North and South (See service area map provided). We are an S corporation registered in the State of Florida and have not received outside funding. All of our towers are currently capable of providing 3Mbps internet service to the end user and several towers are capable of end user speeds of 10Mbps. Our tower locations are densely located to provide almost 100% coverage. In addition we can provide custom solutions to meet the special needs of almost any organization or end user. Most internet customers in Highlands County have multiple choices for Broadband Internet service providers. The following is a list of other service providers who have significant coverage areas in Highlands County: Vistanet Wireless, Embarq DSL, Comcast Cable, and Several Cellular Providers. Collectively these providers including HTN have almost complete coverage to Highlands County residents and businesses. Highlands County has a large population of seasonal residents.
Submitter: VistaNet Ventures, Inc.

Comment: VistaNet Ventures, Inc. has been faithfully servicing the Florida Heartland Counties of Highlands, Hardee, and DeSoto with broadband internet access since May of 2005. Our principal means of service delivery is fixed wireless broadband. VistaNet currently operates a continuous coverage fixed wireless network that spans over 3600 square miles throughout the region. We service over 5700 residential, business and public institution subscribers in Highlands, Hardee and DeSoto counties. Our service is a performance oriented fixed wireless providing download speeds of up to 10 MB. Our business has been 100% privately financed and is located in a Florida HUB Zone and Rural Area of Economic Concern.

Submitter: CenturyLink

Comment: 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 7 million access lines and 2.1 million broadband customers in 33 states.
-----Service Area: NC-Garysburg

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: OH-Dover

Submitter: Time Warner Cable, Inc.

Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area: MS-Sunflower

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable One’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard , Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  AL-Hayneville

Submitter:  Hayneville Telephone Company, Inc.

Comment:  Hayneville Telephone Company provides telecommunications and high-speed Internet services within the proposed service area of Hayneville, located in Lowndes County, Alabama. Hayneville Telephone Company provides service to all areas of Hayneville at speeds of 3 MB or less. Hayneville thus may not qualify as an underserved area. Further, AT&T provides telecommunications and broadband services at speeds of 3 MB or less as an incumbent local exchange carrier in portions of Lowndes County.

-----Service Area:  MS-Lula

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard , Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95

Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: MS-Friars Point

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.
Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable One’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  SC-Society Hill

Submitter:  Time Warner Cable
Comment: As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  MD-Valley Lee

Submitter: Gans Communications, LP dba MetroCast Communications

Comment: Gans Communications, L.P. dba MetroCast Communications offers broadband service to 100% of the applicant's proposed service area in St. Mary's County, Maryland. MetroCast offers residential broadband transmission speeds in applicant's proposed service area up to 10Mbps downstream and 1 Mbps upstream, with MetroCast’s most highly-subscribed broadband service having a transmission speed of 7.0Mbps downstream and 512 kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 256 kbps upstream, with advertised offerings of up to 15Mbps downstream and 2 Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 85% of the households and businesses within the applicant's proposed service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including Verizon. According to an FCC report(http://www.fcc.gov/wcb/iatd/comp.html), as of June 30, 2008, ten other companies reported providing high-speed service to this service area. Based on the information provided above, applicant’s proposed service area certainly does not meet the definition of “unserved” or “underserved” as those two terms are defined in the NTIA/RUS NOFA. MetroCast has invested several million dollars of private capital to build an advanced fiber optic network to provide broadband services to St. Mary's County, Maryland, which encompasses most of the applicant’s proposed service area in St. Mary's County. Further details regarding the broadband services MetroCast provides in applicant’s proposed service area are provided below.

-----Service Area:  MS-Holly Springs
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.

Submitter:  MetroCast Communications of Mississippi, LLC

Comment:  MetroCast Communications of Mississippi, LLC offers broadband service to 100% of the applicant’s proposed service area. MetroCast offers residential broadband transmission speeds in applicant’s proposed service area up to 10Mbps downstream and 1Mbps upstream, with MetroCast’s most highly-subscribed broadband service having a transmission speed of 7.0Mbps downstream and 512kbps upstream. MetroCast’s business broadband service offerings start at 3Mbps downstream and 512kbps upstream, with advertised offerings of up to 15Mbps downstream and 3Mbps upstream. Higher business speeds are available with customized service options including direct fiber connections. Over 18% of the households and businesses within the applicant’s proposed service area currently subscribe to MetroCast broadband services. MetroCast is aware of other providers of high speed broadband service in applicant’s proposed service area, including AT&T. According to an FCC report (http://www.fcc.gov/wcb/iatd/comp.html), as of June 30, 2008, 15 other companies reported providing high-speed service to this service area.

Based on the information provided above, applicant’s proposed service area certainly does not meet the definition of “unserved” or “underserved” as those two terms are defined in the NTIA/RUS NOFA.

MetroCast has invested millions of dollars of private capital to build advanced fiber optic networks to provide broadband services in the communities it serves, including the City of Holly Springs and other areas of Marshall County which encompasses a material portion of the applicant’s proposed service area. Further details regarding the broadband services MetroCast provides in applicant’s proposed service area are provided below.
-----Service Area:  NC-Eureka

Submitter:  Time Warner Cable

Comment:  As shown in the attached map and exhibit, TWC currently provides broadband Internet access service in the Proposed Funded Service Area. In addition, we advertise service of speeds above 3 Mbps throughout this service area. We pass over 50% of households, and either (1) have actual broadband subscribership of over 40% of the households in these census blocks or (2) the combined broadband subscribership of the wireline broadband providers (including TWC) in these census blocks is reasonably likely to exceed 40%. Therefore, that portion of the proposed funded service area that overlaps Respondent’s service area reflected in this response is neither “unserved” or “underserved.”

-----Service Area:  LA-Zachary

Submitter:  Cox Communications, Inc

Comment:  Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Louisiana with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited
amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in
greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved
areas, Cox is providing supplemental information that demonstrates, for the above-referenced
application, the following: the location of Cox’s broadband infrastructure; broadband service levels
provided; number of customers served; pricing for each service tier; and marketing materials which
demonstrate service availability. Consistent with the statutory requirement to expend funds only for
projects in eligible areas, we trust that your agencies will use this information -- along with information
from other broadband providers -- to obtain a clear picture of service availability in the area covered by
the application. We encourage the use of independent due diligence to determine the extent of other
broadband service offerings in the proposed funded service area covered by this submission, if other
providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided
with this letter constitutes trade secrets or commercial information that is privileged and confidential
and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this
information to the public, and release of this information could cause competitive harm, by enabling
other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis,
and will inform your final decision concerning the application.

-----Service Area: SC-Waterloo

Submitter: Piedmont Rural Telephone Cooperative, Inc.

Comment: Piedmont Rural Telephone Cooperative, Inc. (PRTC) is an incumbent broadband provider in
Laurens County, SC, an area covered by Edgenics, Inc.’s Waterloo broadband stimulus application. The
PRTC Service Territory is an area served by PRTC and at least three other broadband service providers.
PRTC itself provides universal broadband coverage to 100% of the potential subscribers in its Service
Territory and provides broadband service to approximately 22% of those potential subscribers. PRTC
has consistently and effectively advertised the availability of broadband Internet access at speeds of 3 Mbs and higher throughout its Service Territory. The combined penetration rate of PRTC and all other broadband providers should negate a description of the applicant’s Proposed Service Area as “unserved” or “underserved.”

-----Service Area:  GA-Fitzgerald

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.

-----Service Area:  MS-Winstonville

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.

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable
systems, current advertisements for residential and commercial broadband offerings, and subscriber
data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  OH-Morristown

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.”

-----Service Area: OK-Tullahassee

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.”

-----Service Area: FL-Midway

Submitter: TDS Telecom
**Comment:** TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

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**Service Area:** MS-Drew

**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.

**Submitter:** Cable One, Inc

**Comment:** Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.
Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: LA-White Castle

Submitter: Cox Communications, Inc

Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.
Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Louisiana with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.
---Service Area:  MO-Leadington

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:  MO-East Prierie

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:  MS-McComb

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5 Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard , Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  OK-Guthrie

Submitter:  @Link Services LLC

Comment:  @Link Services LLC is an Oklahoma LLC that has been providing broadband services in Central Oklahoma since 2005. @Link provides high speed internet service with speeds of up to 6Mbs by utilizing fixed wireless technology in both licensed and unlicensed frequencies. @Link provides service in forty four rural, Oklahoma communities and four urban areas in Central Oklahoma through a network of more than 60 tower sites.

The proposed funded service areas overlaps the @Link service area. The overlapping service area has been documented with the use of the mapping tool.

@Link has included copies of advertisements for service within the proposed funded service area.

@Link has determined, at the census block level, the number of residential households currently capable of receiving @Link service. @Link has determined the total number of business establishments within the zip codes included in the polygon. Totals have been provided as requested and supporting documents are available if requested.

@Link has determined, at the census block level, the number of residences and businesses currently subscribing to @Link services as well as the advertised download and upload speeds. Totals have been provided as requested and supporting documentation is available as is necessary.
Submitter: Co Communications Inc.

Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Oklahoma with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other
broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.

We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

-----Service Area:  SC-Greeleyville

Submitter:  Farmers Telephone Cooperative, Inc.

Comment:  As demonstrated in the response, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the first criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds greater than 768 kbps downstream and 200 kbps upstream to more than 50% of the households located within the relevant area. Additionally, Edgenics’ application should not be considered for funding for the relevant service area because it fails to meet the second criterion for underserved since the existing service provider for that portion of the proposed funded service area currently offers facilities-based terrestrial-delivered broadband service at speeds of at least 3 mbps or more in the relevant area. Although less than 40% of the aggregate households may not currently subscribe to FTC's broadband service, it is nonetheless available to more than 99%.

-----Service Area:  MS-Pickens
Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $26.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $49.00
Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $59.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95
Discounted bundles and promotional pricing are also available.

-----Service Area: SC-McBee

Submitter: Sandhill Telephone Cooperative

Comment: Sandhill Telephone Cooperative, Inc. (“Sandhill”) is responding to the application of Edgenics, Inc. for broadband funding under the ARRA. The applicant’s Proposed Funded Service Area encompassing the town of McBee and areas along State Route 151 in Chesterfield County in South Carolina does not meet the definition of “underserved” as defined in the NOFA.

Sandhill’s McBee exchange overlaps 100% of the Proposed Funded Service Area located in Chesterfield County as drawn by the applicant and as drawn by the respondent in the Public Notice Response form. 100% of Sandhill’s customers have access to broadband service at advertised speeds of 3 Mbps or higher in the overlapping area thereby refuting two of the three criteria required for an area to be designated as underserved. Therefore, this Proposed Funded Service Area cannot be considered as underserved.

-----Service Area: MS-Leland

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: TX-Terrell

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.

-----Service Area: LA-Campti

Submitter: Campti-Pleasant Hill Telephone Company Inc.

Comment: The area in Natchitoches Parish, Louisiana described as the Town of Campti La. currently have access to High Speed Broadband. Most of the populations is served by 3m to 10M ADSL2 Plus and/or Fiber to the Home.

-----Service Area: OH-Brewster

Submitter: Massillon Cable TV, Inc.
Comment: BREWSTER VILLAGE, STARK COUNTY, OHIO

This application incorrectly labels the proposed service area as underserved. The proposed service area is well-served by multiple providers.

BASIC FACTS

Broadband Availability – 98.3% of establishments have access to broadband service.

Broadband Adoption – More than 46.7% of residents currently receive broadband service from Massillon Cable TV, Inc. Verizon provides broadband service to additional residents.

High-Speed Options – Massillon Cable TV offers a range of broadband service packages up to 10 megabit/second.

BROADBAND AVAILABILITY - Massillon Cable TV, Inc. has been providing broadband service to the proposed service area for more than 10 years. In addition, Massillon Cable TV, Inc. and Verizon vigorously compete to provide broadband service throughout the entire proposed area.

On June 27, 2008, Connect Ohio (http://www.connectohio.org - a partnership between the State of Ohio and Connected Nation, a national non-profit organization that specializes in increasing technology access and literacy) released the state's first broadband inventory map. The map and supporting data is based on information collected from all Ohio broadband service providers. The primary goal of this mapping and research was to pinpoint areas of Ohio that do not currently have access to broadband technology.

Connect Ohio’s mapping and research clearly show that the proposed service area is not underserved; but already has access to broadband technology. Census Block Level Broadband Data and Connect Ohio’s color-coded, interactive map reveal that the proposed service area includes 921 homes (equal to the 921 homes reported in the proposal). Connect Ohio reports that 905 (98.3%) of these homes have access to broadband service. This is far in excess of the 50% threshold established for underserved markets. Connect Ohio does not include data about businesses. The Census Block Level Broadband Data and color-coded interactive map are available at http://12.180.242.34/OHBroadband/default.aspx and http://www.connectohio.org/mapping_and_research/stimulus_funding_tools.php)
BROADBAND ADOPTION – Massillon Cable TV, Inc. currently provides broadband service to 46.7% of the establishments within the proposed service area. Combined with Verizon’s broadband service, broadband adoption within the proposed service area is clearly higher than 46.7%. This is far in excess of the 40% threshold established for underserved markets.

HIGH-SPEED OPTIONS – Massillon Cable TV, Inc. offers broadband service at various levels. Residential customers can choose between Economy (1 megabit/second) and Mega (6 megabits/second) service. Business customers have the added option of dedicated fiber connections with speeds up to 10 megabits/second. These options clearly exceed the 3 megabit/second threshold for underserved markets.

SUMMARY - This proposed service area clearly is not underserved by any measure established by the NOFA definitions. Broadband service in excess of 3 megabits/second is available to 98.3% of the homes. Massillon Cable TV, Inc. serves 46.7% of the homes in the proposed service area. An unknown percentage of homes in the proposed service area receive broadband from Verizon (a competing provider). Therefore, broadband adoption is greater than 46.7% of residents.

Service Area: GA-Morgan

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.

-----Service Area:  MS-Falcon

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The
uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:
- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard , Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:
- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: LA-St. Gabriel

Submitter: East Ascension Telephone Co. LLC dba EATel

Comment: EATel currently provides access to 92% of the households within the area of the proposed funded serving area indicated “PFSA” based upon company wide data. EATel is a rural ILEC that has
been serving the area for some time. In the challenged PFSA they offer both ADSL as well as FTTH broadband data services. As of June 2009 they are serving 3 broadband customers within this area or 100% of the households. EATel provides speeds of over 3Mbps throughout this area. Therefore by any of the definitions of the ARRA broadband program this area does not qualify as Underserved or unserved.

Submitter: Cox Communications, Inc

Comment: Cox Communications, Inc. (Cox) is a broadband communications and entertainment company, providing advanced digital video, Internet, telephone and wireless services over its nationwide IP network. The third-largest U.S. cable TV company, Cox serves over 6.2 million residences and businesses.

Cox operates in hundreds of communities in 18 states and has invested over $16 billion in private capital in its network over the least ten years. Cox provides its customers in Louisiana with 21st century infrastructure that provides advanced broadband, video and telephone services. More than 99.5 percent of the households in our service areas have access to Cox high-speed Internet, at some of the fastest broadband speeds available in the nation.

Cox supports the goals of the American Recovery and Reinvestment Act to extend broadband to parts of the country that are unserved or underserved. We appreciate the efforts of the Rural Utilities Service and the National Telecommunications and Information Administration in making sure that the limited amount of broadband stimulus funding available under the ARRA is targeted toward those consumers in greatest need, rather than to areas that already have access to broadband service.

To assist your agencies in ensuring that ARRA funds are directed to truly unserved and underserved areas, Cox is providing supplemental information that demonstrates, for the above-referenced application, the following: the location of Cox’s broadband infrastructure; broadband service levels provided; number of customers served; pricing for each service tier; and marketing materials which demonstrate service availability. Consistent with the statutory requirement to expend funds only for projects in eligible areas, we trust that your agencies will use this information -- along with information from other broadband providers -- to obtain a clear picture of service availability in the area covered by the application. We encourage the use of independent due diligence to determine the extent of other broadband service offerings in the proposed funded service area covered by this submission, if other providers fail to submit information prior to the submission deadline.
We request that this data be treated as confidential and proprietary. Much of the information provided with this letter constitutes trade secrets or commercial information that is privileged and confidential and therefore exempt from public disclosure under 5 U.S.C. § 552(b)(4). Cox does not disclose this information to the public, and release of this information could cause competitive harm, by enabling other broadband providers to tailor their business strategies to unfairly compete with Cox.

Thank you for the opportunity to submit this information. We trust that it will be helpful in your analysis, and will inform your final decision concerning the application.

-----Service Area:  MS-Shelby

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

Submitter:  Cable One, Inc

Comment:  Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.
Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable one’s current broadband service offerings are as follows:

Residential:

- Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
- Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00
- Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

- Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
- Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
- Premium, Speed (Down/up) - 12.0 Mb/1.5 Mb, Service Rate - $99.95
- Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
- Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: MS-Roxie
Submitter: Telepak Networks, Inc.

Comment: Respondent, Telepak Networks, Inc., is a privately held Mississippi corporation and competitive local exchange carrier which provides telecommunications, video and broadband data services to residents in its licensed service areas. Respondent operates a broadband transmission network which runs from Jackson, Mississippi, to Memphis, Tennessee, to New Orleans, and throughout the State of Mississippi. Respondent also operates fiber-to-the-home networks in Crystal Springs, Inverness, and Roxie Mississippi as well as certain residential developments in the State of Mississippi.

-----Service Area: MS-Hollandale

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: AL-Fort Deposit

Submitter: Bright House Networks, LLC

Comment: In support of NTIA and RUS’ efforts to optimize the distribution of the scarce resources available under the ARRA Broadband NOFA, Bright House Networks is providing additional data related to this Applicant’s planned service areas. This application includes service areas which are not underserved.
Submitter: Hayneville Fiber Transport d/b/a Camellia Communic

Comment: Hayneville Fiber Transport and AT&T provide telecommunications and high-speed Internet services within the city limits of Fort Deposit, which is included in the proposed service area in Lowndes County, Alabama. Hayneville Fiber Transport provides high-speed Internet service to all areas of Fort Deposit at speeds of 3 MB or less. Fort Deposit thus may not qualify as an underserved area.

-----Service Area: MS-Como

Submitter: Cable One, Inc

Comment: MS-Como - Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

Please refer to our supporting documentation and comments that establish that Cable One already operates in census tract(s) encompassing or included in Applicant’s Proposed Funded Service Area. The uploaded document includes maps showing census tracts and homes passed for each the applicable systems, current advertisements for residential and commercial broadband offerings, and subscriber data by census tract.

Cable One’s current broadband service offerings are as follows:

Residential:

Economy, Speed (Down/up) - 1.5 Mb/150 kbps, Service Rate - $20.00
Standard, Speed (Down/up) - 5 Mb/500 kbps, Service Rate - $43.00

Premium, Speed (Down/up) - 10 Mb/1 Mb, Service Rate - $53.00

Commercial:

Economy, Speed (Down/up) - 5 Mb/1.0 Mb, Service Rate - $69.65
Standard, Speed (Down/up) - 10.0 Mb/1.0 Mb, Service Rate - $85.95
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Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95
Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area:  GA-Greensboro

Submitter:  James Cable LLC

Comment:  James Cable provides 3Mb broadband service to the community of Greensboro, Georgia.

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.”

-----Service Area:  LA-Clarence

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.
-----Service Area:  MS-Crosby

Submitter:  Franklin Telephone Company, Inc.

Comment:  Respondent, Franklin Telephone Company, Inc., is a privately held Mississippi corporation and rural incumbent local exchange carrier which provides telecommunications, video, and broadband data services to residents in its licensed service areas. Over the years Respondent has utilized funds, including Rural Utilities Service funds, to invest in its network to deploy fiber optic and other state of the art network technologies to provide the residents of its licensed service areas with robust and technologically advanced access to broadband services. Currently, Respondent provides access to broadband services to ninety-eight percent (98%) of the residents in Respondent’s service area. Therefore, no portion of Respondent’s service area, including those which overlap with Applicant’s proposed service area, are unserved.

-----Service Area:  SC-Blackville

Submitter:  TDS Telecom

Comment:  TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

-----Service Area:  MS-Indianola

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.

Submitter: Cable One, Inc

Comment: Cable One, Inc. is a multi-system broadband provider operating in 19 states. Cable One offers residential broadband service with speeds up to 10 MB and customizable commercial solutions with flexible bandwidth offerings from 5Mbps to 1 Gbps. By November 1, 2009, the majority of Cable One systems will also be offering 12 Mb residential broadband service with a 20 MB boost. Cable One provides its subscribers with quality service offerings at competitive rates. Cable One expends substantial capital and resources to ensure that customers enjoy the latest technology and the highest standards of customer service, and has made its customers and its communities its first priority.

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Ultra, Speed (Down/up) - 15.0 Mb/2.0 Mb, Service Rate - $199.95

Enterprise Plus, Speed (Down/up) - 20.0 Mb/2.5 Mb, Service Rate - $299.95

Discounted bundles and promotional pricing are also available.

-----Service Area: FL-Gretna

Submitter: TDS Telecom

Comment: TDS Telecom offers 3Mbps broadband service within the applicants proposed service area and provides broadband service to customers pursuant to the NOFA definitions.

-----Service Area: SC-Jonesville

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.