Applicant Name:  Brazos Valley Council of Governments


-----Service Area:  COGnet

Submitter:  WINDSTREAM

Comment:  Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an unserved area. Windstream offers facilities-based, terrestrial broadband service at advertised speeds of greater than 768 kbps downstream and 200 kbps upstream to some of the households within 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 unserved.

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 “unserved area” as follows: “Unserved area means a proposed funded service area, composed of one or more contiguous census blocks, where at least 90 percent of households in the proposed funded service area lack access to facilities-based, terrestrial broadband service, either fixed or mobile, at the minimum broadband transmission speed (set forth in the definition of broadband above). A household has access to broadband service if the household can readily subscribe to that service upon request.”

Submitter:  Reveille Broadband

Comment:  Reveille Broadband is a small company in the business of providing cable TV, Digital cable, Broadband Internet and VoIP. Reveille provides these services in the "unserved" portion of the
applicants service area. Reveille Broadband has a franchise with the City of Somerville to provide these services in Somerville, as well as a State of Texas franchise to operate in Lyons and the rest of its service area. Reveille competes with Verizon for its triple play customers (video, voice and data) and with a local wireless Internet operator. Reveille does not wish to compete with Texas A&M as well.

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.