Applicant Name: Canby Telephone Association

-----Service Area: Rural Clackamas County Service Expansion Project

Submitter: WaveDivision Holdings, LLC

Comment: WaveDivision Holdings, LLC ("Wave") is a facilities-based, terrestrial provider of high speed Internet, cable television and telephone services. Wave challenges the application of Canby Telephone Association ("Applicant") for last mile funding because Applicant’s proposed funded service area does not meet the requirement set forth in the Notice of Funds Availability to qualify as an “Underserved Area”. The current aggregate broadband penetration in Applicant’s proposed funded service area is approximately 62%, significantly greater than the 40% standard set forth in the NOFA. Additionally, in the portion of Applicant’s proposed service area that is served by Wave more than 50% of the households have access to facilities-based, terrestrial broadband service. Essentially 100% of the households in the areas Wave serves in the proposed funded service area have access to Wave’s broadband services. Accordingly, NTIA and/or RUS must deny Applicant’s funding proposal.

Submitter: AT&T

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

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