

## Broadband USA Applications Database

**Applicant Name:** Minnesota Valley Television Improvement Corporation

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### Public Notice Submissions

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-----**Service Area:** West

**Submitter:** Farmers Mutual Telephone Company

**Comment:** i. Farmers Mutual Telephone Company service territory overlaps by less than 1% (based upon households passed) of the Minnesota Valley Television Improvement Corporation – West proposed funded service area (PFSA). MVTV designates this area as underserved. Only 42% of the PFSA is underserved. Based on the NOFA definition, the PFSA does not qualify for funding. Also, the penetration for FMTC is reasonable in the overlap area. When combined with other providers, the total penetration may be over 40% for the entire PFSA. In addition, FMTC provides service to the entire overlap area with service that is advertised at 3 Mbps or above. Farmers Mutual has built a fiber to the premise network covering 100% of its exchanges.

-----**Service Area:** North East

**Submitter:** Broadband Corp

**Comment:** Broadband Corp currently offers services to both residential and business customers that meet the requirements for this NOFA. The Broadband Corp network currently covers a portion of the proposed services area requested by the Minnesota Valley Television Improvement Corporation proposal.

**Submitter:** Mediacom Communications Corporation

**Comment:** A number of households in applicant's proposed service area are currently served by Mediacom. 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 to 20 Mbps.

**Submitter:** CenturyLink Corporation

**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.

**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:** Lakedale Communications

**Comment:** Applicant proposes to offer broadband services in Paynesville, MN. Lakedale Communications, a subsidiary of Iowa Telecom is the incumbent local exchange carrier in Paynesville, MN and already offers 3 to 15 mbps broadband last-mile service throughout the proposed service area. In addition, Iowa Telecom provides dual fiber routes as middle-mile facilities to Paynesville, MN. Mediacom competes in Paynesville, MN. Based on the variety of broadband services already offered in Paynesville, MN, Iowa Telecom asks that this application be rejected.

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

**Submitter:** diversiCOM-Wisper Wireless

**Comment:** In mid 2005 we created a company, Wisper Wireless to invest in rural areas using wireless technologies where little or no broadband service was available. Today we are using wireless cutting edge (WiMAX) technology to deliver these services. Initial and ongoing investment dollars are

significant. Further, there is a limited amount of households in these markets to support this effort or that are requesting service. As part of this effort we also provide internet classes to our customers to educate them on the basic of internet, web browsing and email. Due to the low population densities we believe sustainable adoption is a more vital tool then putting more providers to cover the same area.

**Submitter:** Runestone Telephone Association

**Comment:** Minnesota Valley Television Improvement Corporation's proposed project covers a portion of the Cyrus exchange served by Runestone Telephone Association. We currently serve the exchange by an existing fiber-to-the-home network. In the public notice response Runestone Telephone Association is providing; 1) a map of the overlapping area Runestone provides broadband services, 2) Runestone's DSL high speed internet advertising 3) the number of residential households and business establishments capable of receiving broadband services, 4) the number of residential households and business establishments subscribing to our broadband, 5) the advertised download and upload speeds and service rates, and 6) comments addressing the existing services offered within the proposed funded service area.

**Submitter:** Federated Telephone Cooperative

**Comment:** i. Federated Telephone Cooperative service territory overlaps approximately 1% (based upon households passed) of the Minnesota Valley Television Improvement Corporation – North proposed funded service area (PFSA). MVTV designates this area as underserved. Only 29% of the PFSA is underserved. Based on the NOFA definition, the PFSA does not qualify for funding. Also, the penetration for FTC is reasonable in the overlap area. When combined with other providers, the total penetration may be over 40% for the entire PFSA. In addition, FTC provides service to the entire overlap area with service that is advertised at 3 Mbps or above. Federated has built a fiber to the premise network covering all of its exchanges.

**Submitter:** CenturyLink Corporation

**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.

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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.

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**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:** Lowry Telephone Company LLC

**Comment:** Minnesota Valley Television Improvement Corporation's proposed project covers the exchange area served by Lowry Telephone Company LLC. We currently serve the exchange by an existing fiber / copper network. In the public notice response Lowry Telephone is providing; 1) a map of the overlapping area Lowry provides broadband services, 2) Lowry's DSL high speed internet advertising 3) the number of residential households and business establishments capable of receiving broadband services, 4) the number of residential households and business establishments subscribing to our broadband, 5) the advertised download and upload speeds and service rates, and 6) comments addressing the existing services offered within the proposed funded service area.

**Submitter:** Starbuck Telephone Company

**Comment:** Starbuck Telephone Company has been providing telecommunications service to the community of Starbuck since 1902. Since 1996, the Company began providing broadband service to the community and the surrounding area.

We disagree with the Applicant's assertion the area is underserved. At no time did the Applicant contact us to determine areas that presently have broadband services. In fact, they apparently did not conduct research with the FCC to determine if a service provider was in the area. Had they checked, they would have found that our FCC form 477 indicates our Company provides broadband service to 100% of our end users and of those 100% are above download speeds greater than 768 kbps.

-----**Service Area:** South East

**Submitter:** Broadband Corp

**Comment:** Broadband Corp currently offers services to both residential and business customers that meet the requirements for this NOFA. The Broadband Corp network currently covers a portion of the proposed funded service area requested by the Minnesota Valley Television Improvement Corporation proposal.

**Submitter:** Mediacom Communications Corporation

**Comment:** A large number of households in applicant's proposed service area are currently served by Mediacom. 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 to 20 Mbps.

**Submitter:** Sleepy Eye Telephone

**Comment:** Sleepy Eye Telephone Company serves the communities and surrounding areas of Sleepy Eye, Hanska, Goodhue, Bellechester, White Rock, and Mazeppa in south central and southeast Minnesota. Sleepy Eye Telephone is the incumbent local exchange carrier and by the NOFA definition of broadband, is neither unserved nor underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this area.

**Submitter:** US Cable of Coastal-Texas, L.P.

**Comment:** US Cable of Coastal-Texas, L.P. operates cable television systems that are overlapped by applicant's proposed service area.

**Submitter:** Christensen Communications Company

**Comment:** Christensen Communications Company (CCC) provides high speed broadband in the communities of Madelia and St. James. Comcast Cable is a second provider in Madelia. Mediacom and EMBARQ are additional providers in St. James. In addition, CCC provides speed in excess of 3Mbps downstream to the rural area outside of the Madelia City limits. Eastern Watonwan County is not underserved, as there are more than one provider and all providers offer speeds in excess of 3Mbps.

**Submitter:** New Ulm Telephone

**Comment:** New Ulm Telecom, Inc. serves the City of New Ulm and surrounding area in rural Minnesota. New Ulm Telecom is the incumbent local exchange carrier and by the NOFA definition of broadband, is neither unserved nor underserved. Due to the satisfaction of these definitions, no ARRA funds should be awarded to the applicant in this area.

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