

## Broadband USA Applications Database

**Applicant Name:** Bresnan Communications

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### Public Notice Submissions

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-----**Service Area:** Dodson

**Submitter:** Central Montana Communications

**Comment:** Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Central Montana Communications, this area does not meet the definition of underserved under the ARRA. Central Montana Communications offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area subscribe to broadband thru Central Montana Communications.

-----**Service Area:** Saco

**Submitter:** Nemont Telephone Cooperative, Inc.

**Comment:** The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in the area. Nemont can demonstrate that, of the three criteria used to qualify an area as underserved, none are applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA), at least 40% subscription rate and advertising at least three megabits per second (3Mbs).

-----**Service Area:** Crow Cheyenne Indian Reservation

**Submitter:** Project Telephone Company dba Nemont

**Comment:** The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in our service area. Nemont can demonstrate that within the area Nemont serves, of the three criteria used to qualify an area as underserved, two are not applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA) and advertising at least three megabits per second (3Mbps).

**Submitter:** Project Telephone Company, Inc. dba Nemont

**Comment:** The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in the area. This funded service area has been defined as 'unserved' when Nemont can demonstrate that the services that Nemont offers and provides in this proposed funded service area far exceed the thresholds set of more than 10% of households having access to broadband service (as defined in the NOFA).

**Submitter:** Range Telephone Cooperative

**Comment:** Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) and a Competitive Local Exchange Carrier (CLEC) serving 5490 access lines in rural Southeastern Montana. Range service area includes the Northern Cheyenne Indian Reservation and a portion of the Crow Reservation including the towns of Lame Deer and Busby, Montana. The counties included are Carter, Custer, Rosebud, Powder River, Treasure and Big Horn in Montana. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range's service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range's serving area subscriber households and business locations are capable of 3mb service today. Approximately 45% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant's proposed funded service area that overlaps Range's service area in Montana is not unserved or underserved as represented in the applicant's proposal.

With respect to the Bresnan application for broadband funds support on the Northern Cheyenne Reservation and the Crow Reservation that Range serves today, we are very disturbed by the comments made by Bresnan as to the poor broadband service or no broadband service that the businesses and residents have there. They are just totally untrue.

Range has been providing excellent communication services to both reservations for over 40 years. Range used RUS loan funds to build the infrastructure on these reservations to get them the service. Range is a Cooperative that is owned by its members and therefore owned by its members on these reservations and they get the same high quality communication services that everyone else gets in our company. These reservations are represented by 3 board members who live on our nearby the reservations and are responsible for taking care of those members needs. They do a very good job of that. We have a fiber that goes right through the Northern Cheyenne Reservation and just on the boundary of the Crow Reservation area that we serve (we only serve a small part of the Crow Reservation). We are currently in the process of upgrading with electronics that will further improve the broadband services on the reservation.

We took a look at a US Census Bureau report that shows that 86.2% of the homes occupied on the Crow Reservation have telephone service and that 78.5% of the homes occupied on the Northern Cheyenne Reservation have telephone service. We have the capability of getting 1.5 mb or higher broadband service on the Crow Reservation in the Busby area and on the Northern Cheyenne Reservation. As you can see, we provide them the possibility of very good broadband service right now and are working as we speak on improving the capabilities even more today.

Range has a very good working relationship with both reservation tribal authorities and has for a very long time. They are valued customers that we work with very closely every day. We have 4 construction employees based out of the Ashland area on the Northern Cheyenne Reservation and 3 combination technicians based out of the area as well.

Range allows enrolled tribal members to take advantage of the discounts where they can get their telephone service for \$1 per month if they qualify and meet all the requirements and we advertise this service with them regularly. Therefore their telephone service is very affordable and our DSL rates are very competitive.

Bresnan said that it simply has not been affordable for any entity to build a broadband network out on the reservations and that is not true in any way as we have already, we will continue to improve it, and those customers demand it. We feel improving our broadband services to all of the customers on the reservations and everywhere else that we serve is of the utmost importance in today's world and economy. Yes the terrain is difficult, but we deal with that every day and have done so for over 40 years.

Range already has established business relationships with the reservations utilizing the E Rate program and the Health program. Range has refunded capital credits every year for over 20 years to customers on the reservation that makes their communication services even more affordable.

In any case, we feel we do and have done an excellent job on these two reservations for years of providing them high quality, affordable telecommunication services and now broadband. Our goal is to eventually provide 100 mb of broadband to them in 4-5 years. We are currently involved in a RUS loan application to the tune of \$18 million dollars. A lot of those loan funds will be targeted on the reservations and we will be trying to get fiber to the home. We didn't apply for grant funds or loans funds through this stimulus funding because our customers are SERVED and we wouldn't have had our application accepted. The notion that the customers on the reservations that we serve are either unserved or underserved is just not true.

On the Northern Cheyenne Tribe website the Governor of Montana, Brian Schweitzer, invites tribal members to an influenza summit—a webinar presentation (which obviously requires DSL) and the webinar sites were at the Tribal Building, the IHS Conference room and the DES office.

In summary, Bresnan's comments and conclusions of what is available on the Northern Cheyenne and our service area portion of the Crow Reservation are just not correct and no stimulus funds should be allotted to them for these areas.

-----**Service Area:** Glendive to Terry

**Submitter:** Mid-Rivers Communications

**Comment:** As shown on our response map, this area is NEITHER UNSERVED OR UNDERSERVED, as Mid-Rivers Communications has a middle mile fiber route in place AND provides broadband to many existing customers in this area today. Mid-Rivers currently provides and advertises broadband services up to 10 Mbps downstream in and around the community of Glendive, Montana, and up to 3 Mbps downstream in the community of West Glendive, Montana. Broadband up to 3 Mbps downstream is also provided and advertised in Fallon, Montana, which is labeled on the applicant's map as unserved though not listed among the Applicant's chosen communities. Broadband up to 12 Mbps / 2 Mbps can also be provided upon request in the Glendive area, in addition to Business Internet and Ethernet services scalable up to symmetrical speeds of 100 Mbps. Mid-Rivers also currently has in place a Gigabit

Ethernet fiber route paralleling the Glendive to Terry route indicated on the Applicant's map. Broadband stimulus funding should not be awarded to the Applicant in this service area, as the requested funding would be used to OVERBUILD facilities that are already in place due to private investment and other Federal funding sources. Provided with our supporting documentation is a map of the entire Mid-Rivers fiber route in the state of Montana, which again parallels other areas this Applicant has identified for funding in documents submitted to NTIA/RUS by the State of Montana.

-----**Service Area:** Dutton to Vaughn

**Submitter:** 3 Rivers Telephone Cooperative, Inc.

**Comment:** 3 Rivers Telephone Cooperative Inc. currently provides communications services within several of the applicants proposed service areas shown. We currently serve the exchange of Browning, Carter, and Power, and the towns of Conrad and Shelby over an existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----**Service Area:** Fort Peck Indian Reservation

**Submitter:** Nemont Telephone Cooperative, Inc.

**Comment:** The proposed funded service area is fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in the area. Nemont can demonstrate that, of the three criteria used to qualify an area as underserved, none are applicable to this proposed funded service area. The services that Nemont offers and provides in this proposed funded service area far exceed the thresholds set of 50% of households having access to broadband service (as defined in the NOFA), at least 40% subscription rate and advertising at least three megabits per second (3Mbps). Nemont can further demonstrate that the proposed middle mile fiber build proposed in this application duplicates existing fiber transport facilities and thus does not contribute to the goals set forth by the ARRA and should be denied funding.

-----**Service Area:** Fort Belknap Indian Reservation

**Submitter:** Triangle Telephone Cooperative

**Comment:** Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. Because of the service offered by Triangle Telephone, this area does not meet the definition of unserved under the ARRA.

**Submitter:** Central Montana Communications

**Comment:** Central Montana Communications provides broadband service in the area indicated in the attached map using DSL technologies.

-----**Service Area:** Custer to Worden

**Submitter:** VIKING Broadband, Inc.

**Comment:** The communities of Worden and Ballantine in Bresnan's proposed service area of "Custer to Worden" are, and have been, served with broadband service to 10MB by VIKING Broadband, Inc. Note that VIKING itself, also a grant applicant, is currently a benefactor of Bresnan's commercial service. VIKING's backhaul to Bresnan has been online for over a year. Bresnan states in their executive summary that their middle mile proposal "is the first step in the long term plan that will include the establishment of cost effective last mile solutions to be deployed once the fiber network, capable of affordable backhaul, is in place." As long as said "last mile solutions" are left to the local cable operator, who is VIKING, and are not cable company overbuilding by Bresnan, then we would welcome the middle mile project. Our last mile grant application, "VIKING's East of Billings Fiber Future", includes proposed fiber from VIKING's existing point of presence on Bresnan's network across VIKING's service area and past Worden to Pompeys Pillar. In fact, Brenan's middle mile application and VIKING's last mile application complement each other perfectly.

**Submitter:** Project Telephone Company, Inc. dba Nemont

**Comment:** The proposed funded service area is not fully contained within the service area of Nemont Telephone Cooperative, Inc (Nemont). Nemont is aware of broadband services provided by others in the area. This funded service area has been defined as 'unserved' when Nemont can demonstrate that the services that Nemont offers and provides in this proposed funded service area exceed the thresholds set of more than 10% of households having access to broadband service (as defined in the NOFA).

**Submitter:** Mid-Rivers Communications

**Comment:** As shown on our response map, this area is NEITHER UNSERVED OR UNDERSERVED, as Mid-Rivers Communications has a middle mile fiber route in place AND provides broadband to many existing customers in this area today. Mid-Rivers currently provides and advertises broadband services up to 3 Mbps downstream in and around the community of Custer, Montana, which has been labeled on the Applicant's map as unserved. Mid-Rivers also currently has in place a Gigabit Ethernet fiber route paralleling the Custer to Worden route indicated on the Applicant's map. Broadband stimulus funding should not be awarded to the Applicant in this service area, as the requested funding would be used to OVERBUILD facilities that are already in place due to private investment and other Federal funding sources. Provided with our supporting documentation is a map of the entire Mid-Rivers fiber route in the state of Montana, which again parallels other areas this Applicant has identified for funding in documents submitted to NTIA/RUS by the State of Montana.

-----**Service Area:** Loma to Rocky Boy's Indian Reservation

**Submitter:** Triangle Telephone Cooperative

**Comment:** Triangle Telephone Cooperative provides broadband service in the area indicated in the attached map using DSL technologies. The area is broken into two sections the first of which the applicant considers unserved. Because of the service offered by Triangle Telephone, this area does not meet the definition of unserved under the ARRA. In the area that the applicant considers underserved, Triangle Telephone offers broadband to greater than 50% of the households in the area, advertises speeds of three mbps, and greater than 40% of the households within the area identified by Triangle Telephone subscribe to broadband thru Triangle Telephone. This area is not underserved.

-----**Service Area:** Shelby to Conrad

**Submitter:** 3 Rivers Telephone Cooperative, Inc.

**Comment:** 3 Rivers Telephone Cooperative Inc. currently provides communications services within several of the applicants proposed service areas shown. We currently serve the exchange of Browning, Carter, and Power, and the towns of Conrad and Shelby over an existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----**Service Area:** Blackfeet Indian Reservation

**Submitter:** 3 Rivers Telephone Cooperative, Inc.

**Comment:** 3 Rivers Telephone Cooperative Inc. currently provides communications services within several of the applicants proposed service areas shown. We currently serve the exchange of Browning, Carter, and Power, and the towns of Conrad and Shelby over an existing fiber network that extends from our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.

-----**Service Area:** Carter

**Submitter:** 3 Rivers Telephone Cooperative, Inc.

**Comment:** 3 Rivers Telephone Cooperative Inc. currently provides communications services within several of the applicants proposed service areas shown. We currently serve the exchange of Browning, Carter, and Power, and the towns of Conrad and Shelby over an existing fiber network that extends from

our corporate headquarters in Fairfield, Mt. In the public notice response 3 Rivers is providing; 1) a map of the area 3 Rivers provides broadband services, 2) 3 Rivers 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 purchasing 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.