

## Broadband USA Applications Database

**Applicant Name:** AlphaStar America, LLC

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### Public Notice Submissions

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-----**Service Area:** Mississippi, Bolivar County

**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:** Idaho, Blaine County

**Submitter:** DigitalBridge Communications Corp

**Comment:** DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cox) and DSL (Qwest) broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.

**Submitter:** Cox Communications

**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 last ten years. Cox provides its customers in Idaho 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:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of AlphaStar America, LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** Illinois, White

**Submitter:** NewWave Communications

**Comment:** NewWave and another provider currently provides service to this area. NewWave serves 11 percent of data customers vs. homes passed and offers 3 MG or higher service to all.

-----**Service Area:** Mississippi, Panola County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Iowa, Sioux County

**Submitter:** Northern Iowa Tel. Co. dba Premier Communications

**Comment:** The information contained in this response supports the fact that customers within our service territory, which overlaps the applicant's proposed service area, have access to high quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----**Service Area:** Iowa, Marion County

**Submitter:** Mediacom Communications Corporation

**Comment:** Mediacom currently provides applicant's proposed service area with broadband services at speeds well in excess of the minimum broadband speeds set forth in the NOFA. Mediacom advertises and provides broadband services within the proposed service area at speeds up to 20 Mbps.

-----**Service Area:** Colorado, Eagle

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of AlphaStar America, LLC for funding for an area represented as "unserved" that is located, in whole or in part, in Qwest's broadband service area.

-----**Service Area:** Idaho, Bonneville County

**Submitter:** DigitalBridge Communications Corp.

**Comment:** DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant's PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest)

broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.

**Submitter:** KeyOn Communications

**Comment:** KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of AlphaStar America, LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** Illinois, Christian

**Submitter:** Consolidated Communications

**Comment:** Consolidated Communications serves as a rural incumbent local exchange carrier (ILEC) in the proposed funded service area defined by this applicant. As such, 100% of the households that are within Consolidated's ILEC footprint in the proposed funded service area have access to Consolidated's facilities-based terrestrial broadband service as defined in the Notice of Funding Availability (NOFA). In addition to Consolidated, the proposed funded service area also has access to broadband service as defined in the NOFA through 9 other providers. Furthermore, as evidenced by the materials provided with this submission, Consolidated advertises broadband services of 3 Mbps and higher in the proposed funded service area. Finally, as described herein, Consolidated’s subscribership rate for its own customers in the applicant’s proposed funded service area is in excess of 40%. Therefore, the applicant’s classification of this proposed serving territory as “unserved” is completely unjustified.

-----**Service Area:** Mississippi, Leflore County

**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:** Pennsylvania, Clearfield County

**Submitter:** Tele-Media Company of Zion, L.L.C.

**Comment:** Tele-Media Company of Zion, LLC currently provides cable TV service including broadband services in two areas in central Pennsylvania. This application includes a portion of an area currently served with broadband services that meets or exceeds broadband service as defined; accordingly, our service area is not unserved or underserved.

-----**Service Area:** Tennessee, Sumner County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Nebraska, Lancaster County

**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."

-----**Service Area:** Texas, El Paso

**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."

**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."

-----**Service Area:** Texas, Terry

**Submitter:** Poka Lambro Telephone Cooperative, Inc.

**Comment:** Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

**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."

-----**Service Area:** Indiana, Hendricks

**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:** Illinois, Clinton

**Submitter:** Wisper ISP Inc.

**Comment:** We are a High Speed Wireless company that has been serving the

mapped area for 6+ years with great success. We advertise packages ranging from 1Mbps to 5Mbps in every town we service. We also do custom links up to Gigabit speeds which have been done successfully for several businesses. We have a network of over 130 towers ranging in height from 30 ft to 1,500 ft in our coverage areas and this number is ever growing. We work with many city governments and have provided private wireless links for several city

Police, Fire, water and park departments. When considering the numbers we have submitted please remember that the overall percentages of coverage will look low because our network covers metro as well as rural towns. In Metro areas we are a small competitor with the major telco and cable providers. We also have several wireless competitors in the rural areas including Celerity

Wireless, Tin Cans, HTC to name a few. Our Customer statistics show 10 to 65% subscription rate with Wisper ISP alone in these rural areas. They also show that over 85% of rural homes in these areas have access to our towers as well as the towers of our competitors. As our tower numbers grow and technology gets better our converge area expands dramatically. We therefore

submit that our area is not Unserved and/or Underserved. Wisper ISP Inc. has already been providing high speed wireless internet to the rural communities of our area with a 6+ year track record of success. Wisper has 21 dedicated employees and their families providing service to 3,500+ customers. The Federal money would be better used in other areas that are truly unserved/underserved.

-----**Service Area:** Texas, Lipscomb

**Submitter:** AMA TechTel

**Comment:** As a Texas service provider serving many rural communities, we respectfully request that you review this application for its accuracy in meeting the requirements of underserved and or unserved for the service area as describe.

As we understand in the application process it must meet at least one of the following requirements:

1. No more than 50% of the households in the census designated community or "other area" have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed;

Criteria not met: AMA TechTel provides access to service to more that 50% of the households in the community.

2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least 3 mbps downstream in the census designated community or "other area;" or:

Criteria not met: AMA TechTel advertises broadband services up to 3 Mbps.

3. The rate of broadband subscribership for the census designated community or "other area" is 40 % of households or less.

Criteria not met: In the community of Darrouzett, Texas (79024) and the surrounding areas, which has a population of 303 residents, 145 households, AMA TechTel provides service to 78 households in this community which represents 66% of the households and we are not the incumbent provider.

**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."

-----**Service Area:** Texas, Hall

**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.

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-----**Service Area:** Florida, Gadsden County

**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:** Indiana, Vigo

**Submitter:** Avenue Broadband Communications, Inc.

**Comment:** Avenue started providing 10 Mbps and 3 Mbps high speed internet service to 100% of this Service Area earlier this year. Verizon also provides DSL service to this Service Area at advertised speeds of 3 Mbps. Between Avenue and Verizon, penetration levels exceed 40% of homes passed.

-----**Service Area:** Nebraska, Adams County

**Submitter:** Glenwood Telephone Membership Corporation

**Comment:** Glenwood Telephone has been providing state-of-the-art telecommunication services to Adams County since 1957 and High Speed Internet for over 8 years.

-----**Service Area:** Tennessee, Davidson County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Indiana, Wayne

**Submitter:** DigitalBridge Communications Corp.

**Comment:** DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Comcast) and DSL (Verizon) broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.

-----**Service Area:** Texas, Burleson

**Submitter:** Texas Communications

**Comment:** Texas Communications provides high-Speed wireless Internet to the following counties in central Texas: Brazos, Robertson, Grimes, Burleson and Milam. The PNF in question would provide government funding to directly compete against our privately funded enterprise and increase competition in an already crowded marketplace.

-----**Service Area:** Nebraska, Cass County

**Submitter:** jagWIRELESS

**Comment:** Hello, my name is Danny Olsen and I am writing this on behalf of my employer, jagWIRELESS. jagWIRELESS specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrums available from the FCC. Our organization has been in business for over 7 years and services the broadband needs of rural Southeastern Nebraska and Western Iowa. Through careful business management and investment we have built a network which now provides broadband services to nearly 1200 subscribers, in 2 states, 12 counties and from 50 tower sites. In the areas we provide service we often compete with wire-line and other wireless service providers who may use license and license-exempt delivery methods. We differentiate our product through helpful technical support and quality customer service. We grow our business as customer demand drives our revenues and retract in areas of significant competition.

We recently discovered that AlphaStar America, LLC has requested funds to build a network in Cass County, NE. from the Broadband stimulus program. I wish to submit a dispute regarding the “underserved” designation of this area by AlphaStar America, LLC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both our organization to provide quality services.

The areas which AlphaStar America, LLC intends to provide service already have 2 or more local providers and can also receive mobile broadband services from various national mobile providers.

State	County	City/Area	Cable Internet	DSL Internet	Wireless Internet	Mobile Provider
NE	Cass	Cedar Creek village	No	Windstream	jagWIRELESS	Sprint, Verizon
NE	Cass	Manley village	No	Windstream	jagWIRELESS, Future Technologies	Sprint, Verizon

NE      Cass      South Bend village      No      Windstream      jagWIRELESS, Future Technologies  
Sprint, Verizon

None of these areas need additional broadband competition as they are all well served by private organizations who have invested private dollars to services the broadband needs of the area residents.

#### Underserved Criteria – Advertised Speeds

Our wire-line competitor offers speeds of 6 Mbps in each of these service areas and jagWIRELESS offers speeds of 3 Mbps in each of the service areas. Attached is an advertisement showing that we do advertise these speeds which AlphaStar would like to service.

#### Penetration Rate

Our organization does regular marketing by multiple methods and we occasionally trade customers with the DSL carrier but we are most after the new residents to the area who are newly choosing between multiple carriers.

Our organization has been offering services in this market for 7 years. Based on our marketing and survey's we find that market penetration between our services and those competing with us is well into the 60% range. The remaining 40% of households simply do not want or cannot afford any of the competing service providers, who offer services as low as \$25/mo.

**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.

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-----**Service Area:** Iowa, Hardin County

**Submitter:** Heart of Iowa Communications Cooperative

**Comment:** Heart of Iowa Communications Cooperative was established in 1958 to provide quality telephone service in rural Central Iowa. Since its inception, Heart of Iowa has been evolving to keep up with the many changes and demands of the telecommunications industry. To diversify its service offerings, Heart of Iowa launched its Broadband High Speed Internet service in 2000.

Heart of Iowa has provided service in the Whitten area since the early 1960s. Broadband High Speed Internet service has been available to the area since 2000.

-----**Service Area:** Florida, Marion County

**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.

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-----**Service Area:** Idaho, Fremont County

**Submitter:** DigitalBridge Communications Corp.

**Comment:** DigitalBridge Communications ("DBC") currently offers true 4G, WiMAX broadband service in the applicant's PFSA, serving an active base of residential and business subscribers in the PFSA. Other

companies also serve the PFSA - DBC actively competes with cable (Cable One) and DSL (Qwest) broadband providers in the PFSA. DBC has 100% overlap of its coverage with the PFSA based on households served.

-----**Service Area:** Mississippi, Pike County

**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:** Mississippi, Tallahatchie County

**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:** Florida, Citrus County

**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.

**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 unserved nor underserved.

-----**Service Area:** Illinois, Jackson

**Submitter:** Egyptian Telephone Cooperative Association

**Comment:** Egyptian Telephone Cooperative Association provides comments on this application regarding underserved designation of the proposed funded area.

-----**Service Area:** Arizona, Mohave County

**Submitter:** NPG Cable, Inc.

**Comment:** NPG Cable, Inc. currently provides sufficient broadband access and broadband services to end users and/or end user devices in the Service Area identified by the applicant below.” These services provide data rates that far exceed the underserved requirements set forth by BTOP/NITA, in addition NPG’s current wire solution scales to provide data rates that are unachievable through wireless solutions.

-----**Service Area:** Pennsylvania, Bradford County

**Submitter:** Pencor

**Comment:** RESIDENTIAL PACKAGES

Blue Ridge Communications offers Residential High Speed Internet Packages that range from:  
1.5 Megabits Downstream / 384 Kilobits Upstream to 15Megabits Downstream /2 Megabits Upstream.

COMMERCIAL PACKAGES

Blue Ridge Communications Commercial High Speed Internet Packages range from:

3 Megabits Downstream / 800 Kilobits Upstream to 15 Megabits Downstream / 2 Megabits Upstream.

Blue Ridge Communications/PTD Commercial High Speed Internet Packages range from:

2 Megabits Downstream / 1 Megabit Upstream to 12 Megabits Downstream / 2 Megabit Upstream

-----**Service Area:** Texas, Lynn

**Submitter:** Poka Lambro Telephone Cooperative, Inc.

**Comment:** Poka Lambro is a member-owned provider and has been providing quality telecommunications services within the proposed funding area since 1950. Poka Lambro currently provides both terrestrial and wireless broadband service that is ubiquitous throughout its service area.

-----**Service Area:** Illinois, Henry

**Submitter:** Cambridge TelCom Services, Inc.

**Comment:** Cambridge Telcom Services, Inc. and Cambridge Telephone Company (collectively "Telephone Companies") are located within the Applicant's Proposed Service Area. The Telephone Companies can demonstrate undisputable, documented proof that the Proposed Service Area which overlaps the Telephone Companies territory does not meet the statutory definition of unserved. Therefore, the Telephone Companies respectively request that the application be denied for failure to meet that specific requirement.

-----**Service Area:** Florida, Collier County

**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.

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Indiana, Clay

**Submitter:** Avenue Broadband Communications, Inc.

**Comment:** Avenue began offering 10 Mbps and 3 Mbps high speed internet to 100% of the Service Area earlier this year. Take rates have been strong. Verizon also offers DSL service to this Service Area

at advertised rates of 3 Mbps. Between Avenue and Verizon, penetration levels exceed 40% of homes passed.

-----**Service Area:** Florida, Alachua County

**Submitter:** James Cable LLC

**Comment:** James Cable LLC provides 8Mbps broadband service to the community of Alachua, and Alachua County, Florida.

**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."

-----**Service Area:** Idaho, Canyon County

**Submitter:** SpeedyQuick Networks Inc.

**Comment:** With SpeedyQuick Networks High-Speed Internet access you no longer have to pay for a second phone line to connect to the internet, or wait for Cable or DSL to come to your neighborhood. No more waiting for slow downloads! You can now surf the web and download your favorite content in seconds.

With our High-Speed internet connection, SpeedyQuick Networks can provide a service that is comparable to the fastest broadband internet connections at an attractive price.

Unlike DSL and Cable modems SpeedyQuick Network's Wireless Internet Access requires no wires to access the home or business to connect to our web. Since there are no wires our installation is fast and easy. Like magic you have a broadband connection to our wireless web.

We provide a service that is unmatched in quality, security, and reliability. All it takes is one call to sign up. We're just a phone call away. Call 208.344.3837 or email [sales@speedyquick.net](mailto:sales@speedyquick.net).

We service Boise, Meridian, Nampa, Caldwell, Kuna, Middleton, Star, Eagle, Grand View, Oreana, Murphy, Melba, Marsing, Homedale, Emmett, Payette, Ontario Oregon, Adrian, Parma, Nyssa, Wilder, Greenleaf, Middleton, New Plymouth, Fruitland, Letha, Montour, Sweet, Ola, Horseshoe Bend, Crouch, Garden Valley, Cascade, Smith's Ferry, Payette, Weiser, McCall, Donnelly and surrounding areas.

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of AlphaStar America, LLC funding for an area represented as "unserved" that is located, in whole or in part, in Qwest's broadband service area.

-----**Service Area:** Florida, Union County

**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."

-----**Service Area:** Florida, Nassau County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Texas, Collin

**Submitter:** Rhino Communications

**Comment:** Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC'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 Incumbent Local Exchange Carriers, and RC's network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC's, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services 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 current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----**Service Area:** Nebraska, Seward County

**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."

----**Service Area:** Mississippi, Washington County

**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:** Iowa, Harrison County

**Submitter:** Loganet

**Comment:** Hello, my name is Danny Olsen and I am writing this on behalf of my employer, Loganet. Loganet specifically focuses on the delivery of broadband Internet services via wireless methods, using the unlicensed spectrums available from the FCC. Our organization has been in business for over 7 years and services the broadband needs of rural Southeastern Nebraska and Western Iowa. Through careful business management and investment we have built a network which now provides broadband services to nearly 1200 subscribers, in 2 states, 12 counties and from 50 tower sites. In the areas we provide service we often compete with wire-line and other wireless service providers who may use license and license-exempt delivery methods. We differentiate our product through helpful technical support and quality customer service. We grow our business as customer demand drives our revenues and retract in areas of significant competition.

We recently discovered that AlphaStar America, LLC has requested funds to build a network in Harrison County, IA. from the Broadband stimulus program. I wish to submit a dispute regarding the “underserved” designation of this area by AlphaStar America, LLC. I will carefully detail the evidence to show that the funds request is without merit and will likely damage the ability of both or organization to provide quality services.

The areas which AlphaStar America, LLC intends to provide service already have 2 or more local providers and can also receive mobile broadband services from various national mobile providers.

State	County	City/Area	Cable Internet	DSL Internet	Wireless Internet	Mobile Internet
IA	Harrison	Magnolia City	Long Lines	Iowa Telecom	Loganet, Pinpoint	
	Communications	Verizon				

This area does not need additional broadband competition as it is well served by private organizations who have invested private dollars to services the broadband needs of the area residents.

#### Underserved Criteria – Advertised Speeds

Our wire-line competitor offers speeds of 6 Mbps in each of these service areas and Loganet offers speeds of 3 Mbps in each of the service areas. Attached is an advertisement showing that we do advertise these speeds which AlphaStar would like to service.

#### Penetration Rate

Our organization does regular marketing by multiple methods and we occasionally trade customers with the DSL carrier but we are most after the new residents to the area who are newly choosing between multiple carriers.

Our organization has been offering services in this market for 7 years. Based on our marketing and survey's we find that market penetration between our services and those competing with us is well into the 60% range. The remaining 40% of households simply do not want or cannot afford any of the competing service providers, who offer services as low as \$25/mo.

-----**Service Area:** Iowa, Benton County

**Submitter:** South Slope Cooperative Telephone Company

**Comment:** South Slope Cooperative Telephone Company (South Slope) demonstrates that it provides broadband service throughout the entire area encompassed in the proposed funded Service Area in the AlphaStar America, LLC application; that no interconnection point identified in the proposed project and no part of the proposed project terminates in a proposed funded Service Area that qualifies as unserved or underserved for Last Mile projects; and all of the Last Mile areas to be served identified in the application are served with broadband service by South Slope. Further, South Slope demonstrates that in addition to providing its own last mile broadband services, South Slope has middle mile broadband facilities providing sufficient capacity to support the provision of broadband service to end users.

As demonstrated, 100% of households in the proposed funded Service Area, including the identified interconnection points, 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 South Slope; 100% of the households in the proposed funded Service Area, including the identified interconnection points, have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed as set forth in the definition of broadband; South Slope advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area, including the identified interconnection points; and the rate of broadband subscribership for the proposed funded Service Area, including the identified interconnection points, is greater than 40 percent of households.

-----**Service Area:** Pennsylvania, Crawford County

**Submitter:** Armstrong Utilities Inc.

**Comment:** Significant portions of the proposed funded service area (PFSA) in the above Application do not satisfy the BIP or BTOP definitions of "unserved" or "underserved," and thus, should not be eligible to receive BIP or BTOP funding. Armstrong Cable provides broadband service at speeds of 3MBPS or greater throughout the portions of Applicant's PFSA mapped in this response. (Advertisement uploaded). Armstrong's high speed broadband network passes more than 50%, and high speed broadband exceeds 40%, of households within the areas of Applicant's PFSA mapped herein. Given the presence of other broadband service providers in neighboring towns, it is reasonable to conclude that Applicant has failed to meet the required showings for its entire PFSA, and its application should be denied. At a minimum, Applicant has failed to meet the required showing in the portions of its PFSA served by Armstrong, and therefore, its Application should be denied with respect to the areas mapped herein.

**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."

-----**Service Area:** Pennsylvania, Butler County

**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.

**Submitter:** Armstrong Utilities Inc.

**Comment:** Significant portions of the proposed funded service area (PFSA) in the above Application do not satisfy the BIP or BTOP definitions of "unserved" or "underserved," and thus, should not be eligible to receive BIP or BTOP funding. Armstrong Cable provides broadband service at speeds of 3MBPS or greater throughout the portions of Applicant's PFSA mapped in this response. (Advertisement uploaded). Armstrong's high speed broadband network passes more than 50%, and its high speed broadband exceeds 40%, of its households within the areas of Applicant's PFSA mapped herein. Given the presence of other broadband service providers in neighboring towns, it is reasonable to conclude that Applicant has failed to meet the required showings for its entire PFSA, and its application should be denied. At a minimum, Applicant has failed to meet the required showing in the portions of its PFSA served by Armstrong, and therefore, its Application should be denied with respect to the areas mapped herein.

-----**Service Area:** Idaho, Cassia County

**Submitter:** Safelink Internet

**Comment:** The City of Albion is currently served by 3 last mile and 1 middle mile providers.

-----**Service Area:** Florida, Bay County

**Submitter:** GTC, Inc.

**Comment:** GTC, Inc. ("GTC") is responding to this Public Notice Filing regarding AlphaStar America, LLC's application for broadband funding under the ARRA. The applicant's proposed funded service area is the city of Mexico Beach, Florida. GTC is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 100% of its service area in Mexico Beach, Florida as outlined in the response area map. The proposed funded service area overlaps completely with GTC's incumbent service area, and the applicant claims that this area is "unserved". The data provided in this response demonstrates that the applicant's claim that the proposed funded service area is "unserved" is simply not true. Further, the proposed funded service area cannot be classified as "underserved".

-----**Service Area:** Connecticut, Windham County

**Submitter:** MetroCast Communicatins of CT, LLC

**Comment:** MetroCast Communications of CT, LLC provides Broadband service to public schools, libraries and municipal facilities located in the community of Plainfield, CT encompassing the area of Wauregan in the applicant's proposed service area located in Windham County, CT. MetroCast provides this service to the at no cost to the community. The complimentary service provided to these public facilities is 7.0 Mbps downstream and 512 kbps upstream. MetroCast also offers residential and commercial broadband services to 100% of the residents and businesses in these communities with transmission speeds up to 10Mbps downstream for residential service and 15Mbps downstream for commercial applications. MetroCast's most highly subscribed residential broadband service has transmission speeds of 7.0Mbps downstream and 512kbps upstream. Based on the information provided, the applicant's proposed service area certainly does not meet the definition of "unserved" or "underserved" as those two terms are defined in the NITA/RUS NOFA. MetroCast is aware of numerous other providers of broadband service in applicant's proposed service area. According to an FCC report (<http://www.fcc.gov/wcb/iatd/comp.html>), as of June 30, 2008, 6 other companies reported providing high-speed broadband service to this service area. MetroCast has invested several million dollars of private capital to build an advanced fiber optic network to provide broadband services in the communities of Windham County listed above. Further details regarding the broadband services MetroCast provides in applicant's proposed service area are provided below.

-----**Service Area:** North Dakota, Richland County

**Submitter:** Red River Rural Telephone

**Comment:** Red River Rural Telephone demonstrates that it provides broadband service throughout the Abercrombie and Great Bend areas which is encompassed in the proposed funded Service Area in the AlphaStar America LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Red River's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Red River; 100% of the households in Red River's service territory within the proposed funded 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; Red River advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

-----**Service Area:** Texas, Liberty

**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:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Nebraska, Scotts Bluff County

**Submitter:** Inventive Wireless of Nebraska, LLC dba Vistabeam

**Comment:** AlphaStar America, LLC has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Our coverage area includes the towns of Henry, Lyman, Morrill, Mitchell, Scottsbluff, Gering, Terrytown, Melbeta, Minatare, Bayard, McGrew, Bridgeport, Dalton, Gurley, Broadwater, Lisco, Oshkosh, Lewellen, Potter, Lodgepole, Chappell and Big Springs.

-----**Service Area:** Texas, Kaufman

**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.”

-----**Service Area:** Nebraska, Custer County

**Submitter:** Nebraska Central Telephone Co.

**Comment:** The respondent (Nebraska Central Telephone Company) believes that the applicant AlphaStar America, LLC has misinterpreted the availability of Broadband Internet access service in the response polygon area that represents the respondent’s service area. The respondent is a Local Exchange Carrier (Common Carrier) that offers wireline facilities based Broadband (high speed) Internet access service in the overlap area of the PFSA.

Respondent can provide Broadband Internet access service exceeding 768K downstream and 200K upstream speeds to 100% of the households and businesses in its response polygon. In response to the PFSA, respondent’s advertising copy has been uploaded showing the availability and advertising of service tiers of Broadband speeds up to 5MB downstream and 1 MB upstream. The advertising copy shows that the basic package of Broadband offered by the respondent exceeds the minimum speeds for categorization of a PFSA as “unserved”. As such, the applicant’s request for funds based on the area being “unserved” should be rejected.

In some cases, respondent does not cover an entire zip code with its response polygon, although the business counts generated by the system include all businesses in a reported zip code. As a result some of the business counts reflected in the “Businesses in Zip codes in Polygon” count are not included in respondent's response polygon (overlap area).

-----**Service Area:** Illinois, Bond

**Submitter:** Wisper ISP Inc.

**Comment:** We are a High Speed Wireless company that has been serving the mapped area for 6+ years with great success. We advertise packages ranging from 1Mbps to 5Mbps in every town we service. We also do custom links up to Gigabit speeds which have been done successfully for several businesses. We have a network of over 130 towers ranging in height from 30 ft to 1,500 ft in our coverage areas and this number is ever growing. We work with many city governments and have provided private wireless links for several city Police, Fire, water and park departments. When considering the numbers we have submitted please remember that the overall percentages of coverage will look low because our network covers metro as well as rural towns. In Metro areas we are a small competitor with the major telco and cable providers. We also have several wireless competitors in the rural areas including Celerity Wireless, Tin Cans, HTC to name a few. Our Customer statistics show 10 to 65% subscription rate with Wisper ISP alone in these rural areas. They also show that over 85% of rural homes in these areas have access to our towers as well as the towers of our competitors. As our tower numbers grow and technology gets better our converge area expands dramatically. We therefore submit that our area is not Unserved and/or Underserved. Wisper ISP Inc. has already been providing high speed wireless internet to the rural communities of our area with a 6+ year track record of success. Wisper has 21 dedicated employees and their families providing service to 3,500+ customers. The Federal money would be better used in other areas that are truly

unserved/underserved.

**Submitter:** Harrisonville Telephone Company

**Comment:** Harrisonville Telephone Company provides comments on this application regarding the underserved designation of the proposed funded area.

-----**Service Area:** Indiana, Sullivan

**Submitter:** Smithville Telephone Company, Inc.

**Comment:** The city of Hymera, Indiana is part of a wirecenter served by Smithville Telephone Company, Inc. All of the city of Hymera residents have access to Broadband at 3 Megabits. Only a few past are past the 18,000 kft serving range of DSL. It is not an area that is unserved, and the information filed about Sullivan County, Indiana by AlphaStar America, LLC is false. Smithville has 344 Residential Subscribers and 25 Business Subscribers. Of these 369 customers, 99 have DSL service. In most of its service areas, Smithville Telephone serves about 75% of the households.

-----**Service Area:** Pennsylvania, Luzerne County

**Submitter:** Service Electric BroadbanCable

**Comment:** Service Electric cable provides coverage throughout a large portion of bear creek with speeds as high as 30 MBS penetration is high and prices reasonable

-----**Service Area:** Iowa, Boone County

**Submitter:** Ogden Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----**Service Area:** Ohio, Pickaway County

**Submitter:** Horizon Chillicothe Telephone

**Comment:** AlphaStar America, LLC. requests funding to provide broadband service to Darbyville, Ohio. This area does not meet the definition of unserved or under served. The community of Darbyville, OH, is served by Fiber to the Home (FTTH). Horizon Telcom - Chillicothe Telephone using matching funds under the Community-Oriented Connectivity Broadband Grant Program administered by the United States Department of Agriculture Rural Development built FTTH to the city of Darbyville, OH. The grant was approved in late November 2007 and service was launched in 2008.

Horizon Telcom - Chillicothe Telephone offers broadband download speeds up to 20MB. Nearly 40% of the passed homes subscribe to service with data download speeds of 6MB or better.

-----**Service Area:** Illinois, Mc Donough

**Submitter:** McDonough Telephone Coop.

**Comment:** AlphaStarAmerica, LLC's proposed project covers portions of the exchanges served by McDonough Telephone Coop. We currently serve the exchange areas by an existing Fiber-to-the-Node and Fiber-to-th-Home network. In the public notice response McDonough Telephone Coop is providing; 1) a map of the overlapping area McDonough provides broadband services, 2) McDonough'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.

-----**Service Area:** Iowa, Louisa County

**Submitter:** Mediacom Communications Corporation

**Comment:** Mediacom currently provides broadband services within applicant's proposed service area at speeds well in excess of the minimum broadband speeds set forth in the NOFA. Mediacom advertises and provides broadband services within the proposed service area at speeds up to 20 Mbps.

**Submitter:** Louisa Communications

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant's proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----**Service Area:** Florida, Sumter County

**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 unserved nor underserved.

-----**Service Area:** Nebraska, Kearney County

**Submitter:** Glenwood Telephone Membership Corporation

**Comment:** Glenwood Telephone has been providing state-of-the-art telecommunication services to this area since 1957 and High Speed Internet for over 8 years.

-----**Service Area:** North Dakota, Pierce County

**Submitter:** North Dakota Telephone

**Comment:** • North Dakota Telephone Company (NDTC) service territory overlaps 100 % of the AlphaStar –Pierce proposed funded service area (PFSA). NDTC serves more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, NDTC serves the entire overlapping area with service that is advertised at 6 Meg and penetration of broadband is over 40%. This response replaces an incorrect response submitted earlier.

**Submitter:** North Dakota Telephone

**Comment:** North Dakota Telephone Company (NDTCC) Cooperative service territory overlaps approximately 23.8 % of the AlphaStar –Pierce proposed funded service area (PFSA). NDTC service more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, NDTC service the entire overlap area with service that is advertised at 4 Meg

-----**Service Area:** Florida, Lake County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

**Submitter:** Hometown Broadband Orlando (HBO), LLC

**Comment:** Hometown Broadband Orlando, LLC

RUS Project Designation: New Jersey 1103-A35

## SUMMARY

Hometown Broadband Orlando , LLC is a current RUS Broadband Borrower under that certain Loan and Security Agreement and Note dated January 28, 2008 between Hometown Broadband Orlando, LLC (“HBO”) and the United States of America acting through the Administrator of the Rural Utilities Service (“RUS”).

Our service territories were filed under our RUS loan application in accordance with RUS Bulletin 1738-1 and were subsequently approved by the RUS. The filed service territories and the households within each service territory enable the economic viability of our project and the RUS loan. Based on our original RUS loan application our defined service area serves both underserved and un-served households. HBO has projected acquiring a total of 429 broadband subscribers during the life of the project.

Our RUS approved and planned broadband services exceed the minimum broadband transmission speeds (768 kbps down and 200 kbps up) set forth in the BTOP and BIA programs and we advertise and provide optional speeds up to 6 mbps down and 2 mbps up.

The Applicants service area overlaps the HBO service area as approved by the RUS. If the government were to approve the Applicant’s service area, Applicants right to utilize these significant portions of HBO’s service area would impede the ability of HBO to fully build out its service area. That impedance would result in decreased revenue for HBO, thus interfering with HBO’s ability to repay its RUS loan and to operate profitably.

-----**Service Area:** Iowa, Johnson County,

**Submitter:** Sharon Telephone Company

**Comment:** The information contained in this response proves that customers within our service territory, which overlaps the applicant’s proposed service area, have access to quality, facilities-based broadband service as defined by the RUS/NTIA Notice of Funds Availability (NOFA).

-----**Service Area:** Texas, Chambers

**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:** Ohio, Ross County

**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."

**Submitter:** Horizon Chillicothe Telephone

**Comment:** AlphaStar America, LLC. requests funding to provide broadband service to Adelphi, Ohio. This area does not meet the definition of unserved or under served. Horizon Chillicothe Telephone is the Incumbent Local Exchange Carrier for Adelphi, OH. Using ADSL technology, Horizon Chillicothe Telephone offers broadband download speed up to 1MB in Adelphi at competitive pricing. Horizon Chillicothe Telephone competes with a National Cable provider in Adelphi. This National Cable Provider also advertises broadband speeds in Adelphi which exceed the definition of under served.

-----**Service Area:** Illinois, Williamson

**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.

-----**Service Area:** Florida, Clay County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Florida, Leon County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** New Mexico, Cibola

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the

application of AlphaStar America, LLC, Cibola for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** Iowa, Marshall County

**Submitter:** Heart of Iowa Communications Cooperative

**Comment:** Heart of Iowa Communications Cooperative was established in 1958 to provide quality telephone service in rural Central Iowa. Since its inception, Heart of Iowa has been evolving to keep up with the many changes and demands of the telecommunications industry. To diversify its service offerings, Heart of Iowa launched its Broadband High Speed Internet service in 2000. Heart of Iowa has provided service in the Ferguson area since 1971. Broadband High Speed Internet service has been available to the area since 2000.

-----**Service Area:** Pennsylvania, Carbon County

**Submitter:** Palmerton Telephone Company

**Comment:** The area in question, Bowmanstown Borough is currently served by two competing broadband suppliers, Palmerton telephone Company and Blue Ridge Communications. Both competitors offer download speeds in excess of the current FCC definition of broadband. Bringing a third supplier into this already served area will be a wasteful duplication of effort. Since the area is already adequately served, it is unlikely that a new entrant will gain sufficient market share to make the venture profitable.

**Submitter:** Pencor

**Comment:** RESIDENTIAL PACKAGES

Blue Ridge Communications offers Residential High Speed Internet Packages that range from:

1.5 Megabits Downstream / 384 Kilobits Upstream to 15Megabits Downstream /2 Megabits Upstream.

## COMMERCIAL PACKAGES

Blue Ridge Communications Commercial High Speed Internet Packages range from:

3 Megabits Downstream / 800 Kilobits Upstream to 15 Megabits Downstream / 2 Megabits Upstream.

Blue Ridge Communications/PTD Commercial High Speed Internet Packages range from:

2 Megabits Downstream / 2 Megabit Upstream to 12 Megabits Downstream / 2 Megabit Upstream

-----**Service Area:** Texas, Austin

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

**Comment:** Valley Telephone Cooperative, Inc. provides comments on this application regarding the underserved designation of the proposed funded area.

-----**Service Area:** Nebraska, Saunders County

**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.”

-----**Service Area:** Ohio, Mercer County

**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:** Nebraska, Dodge County

**Submitter:** WesTel Systems

**Comment:** WesTel Systems demonstrates that it provides broadband service throughout the Uehling area which is encompassed in the proposed funded Service Area in the AlphaStar America, LLC application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in WesTel's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from WesTel; 100% of the households in WesTel's service territory within the proposed funded 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; WesTel advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

**Submitter:** Great Plains Communications, Inc.

**Comment:** The AlphaStar America (AA) (AlphaStar) application proposes to provide satellite-based middle mile service to last-mile providers in unserved areas. The application includes proposed funded service areas (PFSAs) in 20 states, including one PFSA served by Great Plains Communications, Inc. (GPC) in Dodge County, Nebraska. GPC will demonstrate that the level of broadband availability in AlphaStar's Dodge County PFSA far exceeds the definition of unserved as contained in the Notice of Funds Available (NOFA).

GPC provides last mile broadband service to 22 census blocks on the Dodge County PFSA. Of the 325 housing units contained in the PFSA, 147 (or 45.2%) have access to broadband from GPC. Therefore, GPC alone far exceeds the threshold for broadband availability required for this PFSA to be considered "unserved." If the level of broadband availability in other PFSAs is comparable to that provided by GPC in this PFSA, the AlphaStar application clearly should be rejected.

Beyond the status of service across the PFSAs proposed, the AlphaStar application disregards the fact that the NOFA does not include satellite service in determining whether an area is underserved or unserved. Indeed, the NOFA specifically only considers access to facilities-based, terrestrial broadband service (fixed or mobile) as a basis for a designation of unserved. Thus, the AlphaStar application should additionally be rejected as it proposes to provide middle mile service via satellite, a technology that the NOFA has rejected as qualifying for consideration as a broadband service under the rules that have been implemented.

Furthermore, GPC operates and maintains middle mile facilities in the Dodge County PFSA that are more than adequate for meeting broadband backhaul demand. GPC is also aware of other facilities-based

middle mile providers operating in or near the AlphaStar Dodge County PFSA. Thus, the AlphaStar application represents an unwarranted use of scarce funding.

-----**Service Area:** Idaho, Idaho County

**Submitter:** Qwest

**Comment:** As authorized by the BIP and BTOP Notice of Funds Availability and the Public Notice associated with the publication of BIP and BTOP broadband infrastructure project funding applications found on the BroadbandUSA.gov website, Qwest responds with broadband service data to the application of AlphaStar America, LLC for funding for an area represented as “unserved” that is located, in whole or in part, in Qwest’s broadband service area.

-----**Service Area:** Mississippi, Calhoun County

**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:** 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 5% 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. 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 advanced fiber optic networks to provide broadband services in the communities it serves, including the Town of Derma and other areas of Calhoun 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:** Iowa, Decatur County

**Submitter:** Grand River Mutual Telephone Company

**Comment:** Alpha Star America's application covers part of Grand River Mutual Telephone Company's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customer receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

-----**Service Area:** Pennsylvania, Adams County

**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:** Iowa, Wayne County

**Submitter:** Grand River Mutual Tel. / South Central Rural Tel.

**Comment:** Alpha Star America's application covers part of Grand River Mutual Telephone Company / South Central Rural Telephone's exchange. Grand River is capable of providing wireline broadband service to 100% of its customers throughout its territory. The majority of Grand River's customers receive service at 6.0 Mbps. Grand River's territory is neither unserved nor underserved.

-----**Service Area:** Nevada, Elko County

**Submitter:** Wirelessbeehive.com LLC

**Comment:** This area is current not underserved. Wirelessbeehive.com serves this area with high speed internet.

-----**Service Area:** Texas, Knox

**Submitter:** Santa Rosa Telephone Cooperative, Inc.

**Comment:** Santa Rosa Telephone Cooperative, Inc. provides comments on this application regarding the underserved designation of the proposed funded area.

**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."

-----**Service Area:** North Dakota, Benson County,

**Submitter:** North Dakota Telephone

**Comment:** North Dakota Telephone Company (NDTC) service territory overlaps approximately 100% of the AlphaStar - Benson proposed funded service area (PFSA) households. NDTC service more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, NDTC service the overlap area with service that is advertized at 6 Meg. Lastly, NDTC provides middle mile service throughout its service territory and connects to a Statewide transport network to reach the Internet.

**Submitter:** North Dakota Telephone

**Comment:** • North Dakota Telephone Company (NDTC) service territory overlaps 100% of the AlphaStar - Benson proposed funded service area (PFSA). NDTC serves more than 10% of the area marked as unserved by the application thus disqualifying it as unserved. In addition, NDTC serves the overlapping area with service that is advertized at 6 Meg and broadband penetration is reasonable so when combined with other carriers, penetration may be over 40%. Lastly, NDTC provides middle mile service throughout its service territory and connects to a statewide transport network to reach the Internet. This response replaces a response submitted earlier.

-----**Service Area:** Colorado, Crowley

**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:** Indiana, Tippecanoe

**Submitter:** Mulberry Cooperative Telephone

**Comment:** AlphaStar America, LCC, proposed broadband project overlaps territory served by Mulberry Cooperative Telephone. Mulberry is capable of serving 100% of its customers. This area is currently capable of receiving high speed broadband access at speeds ranging up to 12 mbps down. As such, this area is "SERVED" based on the definitions as established in the Notice of Funds Availability (NOFA). In this public notice response Mulberry is providing; 1) a map of the overlapping area where Mulberry provides broadband services, 2) Mulberry's DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from Mulberry within our service area, 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.

-----**Service Area:** Florida, Putnam County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Texas, Jefferson

**Submitter:** Cameron Telephone Company, L.L.C.

**Comment:** Cameron Telephone Company has been offering high speed broadband service throughout its exchanges for nine years. The area applied for by the ARRA applicant is served with 3 Mbps service.

-----**Service Area:** North Dakota, McIntosh County

**Submitter:** Dickey Rural Networks

**Comment:** Dickey Rural Networks demonstrates that it provides broadband service throughout the Venturia Area of McIntosh County, which is encompassed in the proposed funded Service Area in the AlphaStar America application and that the proposed funded Service Area is not unserved or underserved.

As demonstrated, 100% of households in Dickey Rural's service territory within the proposed funded Service Area are able to readily subscribe upon request to facilities-based, terrestrial broadband services with an advertised speed of greater than 768 kbps downstream and 200 kbps upstream from Dickey Rural; 100% of the households in Dickey Rural's service territory within the proposed funded 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; Dickey Rural advertises broadband service at broadband transmission speeds of at least 3 megabits per second downstream throughout the proposed funded Service Area; and the rate of broadband subscribership for the proposed funded Service Area is greater than 40 percent of households.

-----**Service Area:** Mississippi, Rankin County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Texas, Hockley

**Submitter:** NTS Telephone Company LLC

**Comment:** NTS Telephone Company LLC is providing Broadband services, beginning at 8 mbps download speed, to the residents in the community of Smyer, TX via a Fiber to the User network. The United States Department of Agriculture, Rural Utilities Service funded the overbuild of this community under RUS Broadband Loan TX 1112-A.

**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."

-----**Service Area:** Texas, Terrell

**Submitter:** Big Bend Telephone Co.

**Comment:** Big Bend Telephone Company, Inc. is an ILEC currently providing terrestrial broadband data service within portions of the proposed funding area. Big Bend Telephone has served this area as the provider of last resort since 1960 and currently provides broadband service throughout 100% of its rural service territory.

-----**Service Area:** Pennsylvania, Susquehanna

**Submitter:** The North-Eastern Pennsylvania Telephone Company

**Comment:** The North-Eastern Pennsylvania Telephone Company (NEP Telephone) is a rural telephone company under the Telecommunications Act of 1996. NEP Telephone's Service Area includes portions of Lackawanna, Susquehanna, and Wayne Counties in northeastern Pennsylvania. NEP Telephone respectfully submits that applicants for BTOP and BIP money from the 2009 Broadband Stimulus Act for proposed funded service areas within NEP Telephone's Service Area have not conducted adequate due diligence and do not qualify for funding. NEP Telephone currently offers a wide range of products, including but not limited to high speed residential and business DSL, satisfying the federal broadband standard of providing two-way data transmission with advertised speeds of at least 768 kilobits per second (kbps) downstream and at least 200 kbps upstream to end users, and achieving transmission speeds of at least 3 Mbps downstream.

NEP Telephone has provided state-of-the-art services in northeastern Pennsylvania for over 108 years. Pursuant to Pennsylvania state law, Act 183 of 2004, as of December 31, 2008, NEP Telephone has deployed broadband service offering minimum transmission speeds of 1.544 Mbps downstream/128 kbps upstream to 100% of its Service Area. NEP Telephone also offers up to 5 MB download/ 896 kbps upload speeds to business customers and 3 MB download/ 896 kbps upload speeds to residential customers. NEP Telephone is also undertaking a new, multi-million dollar project that will eventually

bring a MPEG 4 IPTV platform and Fiber to the Home (FTH) capability throughout its Service Area, enhancing broadband speeds to up to 25 MB download/ 10 MB upload speeds throughout the area.

All companies should be on equal footing. NEP Telephone has invested millions in current broadband technologies and has commenced a project to invest millions more in a fiber to the home platform. NEP Telephone's Service Area is neither unserved nor underserved.

Tim Stearns

The North-Eastern Pennsylvania Telephone Company

VP Operations

**Submitter:** Pencor

**Comment:** RESIDENTIAL PACKAGES

Blue Ridge Communications offers Residential High Speed Internet Packages that range from:

1.5 Megabits Downstream / 384 Kilobits Upstream to 15Megabits Downstream /2 Megabits Upstream.

COMMERCIAL PACKAGES

Blue Ridge Communications Commercial High Speed Internet Packages range from:

3 Megabits Downstream / 800 Kilobits Upstream to 15 Megabits Downstream / 2 Megabits Upstream.

Blue Ridge Communications/PTD Commercial High Speed Internet Packages range from:

2 Megabits Downstream / 2 Megabit Upstream to 12 Megabits Downstream / 2 Megabit Upstream

-----**Service Area:** Texas, Bowie

**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."

-----**Service Area:** Colorado, Otero

**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:** Tennessee, Fayette County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Ohio, Hardin County

**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:** Colorado, Weld

**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.

-----**Service Area:** Nevada, Humboldt County

**Submitter:** Humboldt Telephone Company

**Comment:** Humboldt Telephone Company is the local exchange carrier and provider of last resort in this area. Our service facilities extend to all residences and business establishments in our service area. Humboldt provides facilities-based, terrestrial broadband to our customers in the McDermitt and Quinn exchanges covered by this application. Currently, broadband is available to approximately 84% of our business and residential customers, at minimum download speeds of 1.544 mbps and minimum upload speeds of 512 kbps.

-----**Service Area:** Ohio, Henry County

**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:** Indiana, Henry

**Submitter:** Hancock Telecom

**Comment:** Hancock Rural Telephone Corp (d/b/a Hancock Telecom) is a rural ILEC and RUS borrower. Sulphur Springs is in one of Hancock's 3 exchanges. Residents in Sulphur Springs are capable of receiving broadband. In 2009, Hancock began overbuilding fiber to the home in the Sulphur Springs area which will ultimately allow speeds up to 100 Meg. The CLEC subsidiary of Hancock Telecom has previously overbuilt the Town of Kennard which has enabled Hancock's CLEC to offer ubiquitous broadband service to the residents of Kennard.

-----**Service Area:** Texas, Fannin

**Submitter:** Rhino Communications

**Comment:** Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC'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 Incumbent Local Exchange Carriers, and RC's network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC's, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other

broadband services 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 current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----**Service Area:** Illinois, Sangamon

**Submitter:** NewWave Communications

**Comment:** Sangamon County is currently being served by NewWave and two other providers. NewWave serves 5 percent of Thayer data customers vs. homes passed and offers 3 MG or higher to all.

-----**Service Area:** Illinois, St. Clair

**Submitter:** Wisper ISP Inc.

**Comment:** We are a High Speed Wireless company that has been serving the mapped area for 6+ years with great success. We advertise packages ranging from 1Mbps to 5Mbps in every town we service. We also do custom links up to Gigabit speeds which have been done successfully for several businesses. We have a network of over 130 towers ranging in height from 30 ft to 1,500 ft in our coverage areas and this number is ever growing. We work with many city governments and have provided private wireless links for several city Police, Fire, water and park departments. When considering the numbers we

have submitted please remember that the overall percentages of coverage will look low because our network covers metro as well as rural towns. In Metro areas we are a small competitor with the major telco and cable providers. We also have several wireless competitors in the rural areas including Celerity Wireless, Tin Cans, HTC to name a few. Our Customer statistics show 10 to 65% subscription rate with Wisper ISP alone in these rural areas. They also show that over 85% of rural homes in these areas have access to our towers as well as the towers of our competitors. As our tower numbers grow and technology gets better our converge area expands dramatically. We therefore submit that our area is not Unserved and/or Underserved. Wisper ISP Inc. has already been providing high speed wireless internet to the rural communities of our area with a 6+ year track record of success. Wisper has 21

dedicated employees and their families providing service to 3,500+ customers. The Federal money would be better used in other areas that are truly unserved/underserved.

-----**Service Area:** Mississippi, Lowndes County

**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:** Illinois, Franklin

**Submitter:** NewWave Communications

**Comment:** NewWave currently serves this area and will provide Valier service in early 2010.

**Submitter:** 4SIWI, LLC

**Comment:** I am filing a response on behalf of 4SIWI, LLC. I currently offer service in the area within and around Orient, IL. I provide service to several residents, businesses and the local water department. My coverage is guaranteed for 2 miles around the Orient water which is located on Orchard St, but covers regions up to 5 miles away into areas of West Frankfort, Zeigler, Benton, Mulkeytown, and Thompsonville.

**Submitter:** KeyOn Communications

**Comment:** KeyOn Communications currently provides access at speeds of at least 768kbps downstream and at least 200kbps upstream to more than 50% of the homes in the designated area.

-----**Service Area:** Colorado, Saguache

**Submitter:** Blanca Telephone Company

**Comment:** ?Broadband service of at least 3 mbps in the subject grant area is already advertized and provisioned. Accordingly, the area is neither "underserved" nor "unserved" as defined by the NOFA. It is uneconomic for stimulus money to be used to overbuild existing broadband services. The NOFA seeks irrelevant information, fails to apply the standard required by the ARRA, requires commenters to provide information without first publishing those requirements and procedures in the Federal Register, and awards stimulus grants based upon "presumptions" which are not found in the ARRA.

-----**Service Area:** Pennsylvania, Allegheny County

**Submitter:** Consolidated Communications

**Comment:** Consolidated Communications serves as a rural incumbent local exchange carrier (ILEC) in the proposed funded service area defined by this applicant. As such, 100% of the households that are within Consolidated's ILEC footprint in the proposed funded service area have access to Consolidated's facilities-based terrestrial broadband service as defined in the Notice of Funding Availability (NOFA). In addition to Consolidated, the proposed funded service area also has access to broadband service as defined in the NOFA through 7 other providers. Furthermore, as evidenced by the materials provided with this submission, Consolidated advertises broadband services of 3 Mbps and higher in the proposed funded service area. Therefore, the applicant's classification of this proposed serving territory as "unserved" is completely unjustified.

-----**Service Area:** Texas, Grayson

**Submitter:** Rhino Communications

**Comment:** Rhino Communications (RC) currently provides a wide array of broadband offerings within the proposed funded service area. RC has been offering broadband services in excess of the bandwidth requirement as set forth in the ARRA, NOFA and BIP/BTOP guidelines, all prior to the ARRA approval. RC'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 Incumbent Local Exchange Carriers, and RC's network allows for leasing of services through our own facilities. The proposed funded service area already provides for not only broadband service through RC, but several CLEC's, Cable companies, and numerous mobile broadband service providers offer several choices to the subscriber. RC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services 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 current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

**Submitter:** TV Cable of Grayson County

**Comment:** Grayson County Cable (GCC) currently provides a wide array of broadband offerings within the proposed funded service area. GCC has been offering 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. GCC'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 Incumbent 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 GCC, but several ILEC's, Wireless companies, and numerous mobile broadband service providers offer several choices to the subscriber. GCC's opinion of the proposed funded service area is that of unnecessary spending within areas where sufficient broadband offerings exist to meet current demands. Whereas the requested funding could be better utilized in other portions of the country to deploy, map, or support other broadband services 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 current stable and thriving service providers to close or consolidate business, leading to layoffs and resulting in another economic downturn.

-----**Service Area:** Florida, Holmes County

**Submitter:** Comcast Cable

**Comment:** Attached is a summary of the Comcast Cable homes passed, subscriber and advertising information related to the service areas encompassed by this application.

-----**Service Area:** Indiana, Monroe

**Submitter:** Smithville Telephone Company, Inc.

**Comment:** Stinesville, Indiana is part of the Ellettsville, Indiana wirecenter that is Smithville Telephone Company's largest wirecenter. We offer 3.0 Meg Broadband to all of Stinesville's residents at this time. AlphaStar America, LLC's assertion that Stinesville, IN is unserved is false. We currently have 30 Residential DSL subscribers and 7 Business DSL subscribers in Stinesville. This is greater than 40% penetration of DSL.

-----**Service Area:** Idaho, Bear Lake County

**Submitter:** Direct Communications - Rockland

**Comment:** Direct Communications-Rockland (DCR) is capable of providing broadband at speeds to 1.5mbps downstream and 512kbps upstream to 90% of its customers in its exchanges of Arbon, Rockland, and Paris, Idaho. DCR is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain areas of its Paris exchange. It appears that Alpha Star's application overlaps the company's exchange service area that includes the community of Bloomington in its Paris exchange and DCR believes that its service area is neither unserved or underserved.

**Submitter:** Direct Communications Cable

**Comment:** Direct Communications Cable (DCC) is capable of providing broadband at minimum speeds of at least to 768kbps downstream and 200kbps upstream to Southeast Idaho customers in the counties and towns it provides broadband services. DCC is also capable of providing higher speeds of broadband up to 6mbps download and 1mbps upload in certain service areas. It appears that Alpha Star's application overlaps the company's area of service that includes the communities of Bloomington and Georgetown and DCC believes that these areas of service are neither unserved or underserved in broadband services.