Applicant Name: GlenMartin, Inc.

Service Area: 1 Chillicothe Chariton

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years. CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers. The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.
Submitter: Mediacom Communications Corporation

Comment: A large number of households in applicant's proposed service area are currently served by Mediacom. Broadband speeds well in excess of the minimum broadband speeds set forth in the NOFA are currently available within the applicant's proposed service area. For its part, Mediacom advertises and provides broadband services within the proposed service area at speeds up to 20 Mbps.

Submitter: 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: 1 Chillicothe Grundy
Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

Submitter: Suddenlink Communications

Comment: This response conclusively demonstrates that Suddenlink and its competitors already offer robust broadband service within the mapped area of the applicant’s proposed funded service area and that this mapped area is neither unserved nor underserved. Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the “Existing Broadband Subscribers” section of this response; (3) a summary of the vendor and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.

-----Service Area: 1 Chillicothe Daviess

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: 100% of Green Hills’ territory served will have access to wireless Broadband up to 3 Meg down speeds by year end or no later than first quarter 2010.

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor 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: 1 Chillicothe

Submitter: Grand River Mutual Tel. / Lathrop Tel.

Comment: GelnMartin’s application covers part of Grand River Mutual Telephone Company / Lathrop 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.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co’s
Comment: • 100% of Green Hills’ service area has access to facilities based Broadband in excess of 768k down/200 up speeds.

• Green Hills’ advertises and provides multiple service speeds including an offering with 3 Meg down.

-----Service Area: 1 Chillicothe Linn

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 20 Mbps.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co's

Comment: • 100% of Green Hills’ service area has access to facilities based Broadband in excess of 768k down/200 up speeds.

• Green Hills’ advertises and provides multiple service speeds including an offering with 3 Meg down.

Submitter: GVNW Consulting, Inc

Comment: Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk’s application overlaps GRM’s service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM’s broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

Submitter: Northeast Missouri Rural Telephone Company
**Comment:** The application submitted by GlenMartin, Inc contains inaccurate and incomplete information for the proposed funded service area. Northeast Missouri Rural Telephone Company (NEMR) demonstrates that it provides broadband service with download speeds greater than 768K to 100% of the households and businesses located within its service territory. As such, this area is “SERVED” based on the definitions as established in the Notice of Funds Availability (NOFA). In this public notice response NEMR is providing; 1) a map of the overlapping area where NEMR provides broadband services, 2) NEMR’s DSL high speed Internet advertising 3) the number of residential households and business establishments capable of receiving broadband services from NEMR 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.

**Submitter:** Windstream

**Comment:** Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an unserved area. Windstream offers facilities-based, terrestrial broadband service at advertised speeds of greater than 768 kbps downstream and 200 kbps upstream to some of the households within the proposed funded service area, and such households can readily subscribe to Windstream’s broadband service upon request. Windstream also has reason to believe that competitive broadband offerings are available in exchanges overlapping the proposed funded service area. Given this information, agency officials should further investigate existing broadband offerings within the proposed funded service area, so that officials can be sure that the area, in fact, qualifies as unserved.

Windstream is a communications and entertainment company with more than 1 million broadband customers in 16 states. Investing more than $200 million in broadband deployment over the last several years, Windstream now offers approximately 89% of its 3 million voice customers access to quality and affordable broadband service.

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

Comment:  This response conclusively demonstrates that Suddenlink and its competitors already offer robust broadband service within the mapped area of the applicant’s proposed funded service area and that this mapped area is neither unserved nor underserved. Additional information is provided in the uploaded document, including (1) sample marketing material; (2) a guide on how to read the data we entered in the “Existing Broadband Subscribers” section of this response; (3) a summary of the vendor and methodology used for estimating competitive-service subscribers in the mapped area; (4) Suddenlink contact information, should one or more federal agencies have questions or require additional information; and (5) a summary of concerns with the response process and the limitations that process has placed on our ability to provide NTIA/RUS with relevant, timely data.

-----Service Area:  1 Chillicothe Livingston

Submitter:  Green Hills Telephone Corp, dba: Green Hills Co's

Comment:  • 100% of Green Hills’ territory served will have access to wireless Broadband up to 3 Meg down speeds by year end or no later than first quarter 2010.

Submitter:  GVNW Consulting, Inc

Comment:  Grand River Mutual Telephone Company is capable of providing broadband at speeds of at least 768Kbps down and 200 Kbps up to 100% of its customers in all of its exchanges where WindTalk's application overlaps GRM's service territory with the majority of customers able to receive broadband at 3.0 Mbps. Over 90% of GRM's broadband customers receive service at 6.0 Mbps. GRM's territory is neither unserved nor underserved.

-----Service Area:  1 Chillicothe Carroll

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 20 Mbps.

Submitter: CenturyLink

Comment: The proposed service areas are not wholly underserved or unserved. CenturyLink is submitting data that shows the application’s proposed service area is not underserved or unserved, under program guidelines. Accordingly, the application must be denied as ineligible. With limited funding and a large pool of applications, program grants and loans must be directed only to areas that are truly underserved or unserved, as stipulated in the program guidelines. CenturyLink can certify that its affiliates currently offer broadband service in some or all of the applicant’s proposed service areas. Attached is a state map that is a representative sample of areas where the application overlaps our existing broadband deployment. CenturyLink also provides data showing broadband availability in our local telephone exchanges within the proposed service areas. We will provide additional information on request if that will further assist the agency’s review. This data is not exhaustive; the application may include other areas also currently served with broadband by other providers, which should be considered in the assessment of the application. Our data combined with that of other broadband providers would likely show further duplication and overlap of broadband services in the proposed service areas. CenturyLink has committed to upgrade and extend broadband. CenturyLink has an extensive broadband footprint today, and has committed to extend that service even further. As part of its merger commitments to the Federal Communications Commission, CenturyLink committed to offer retail broadband Internet access service to 100% of its broadband eligible access lines by July 1, 2012. Consequently, virtually no areas served by CenturyTel or Embarq local operating companies, in any state, will be underserved or unserved at the end of three years. CenturyLink also agreed to meet targets for minimum download speeds. CenturyLink will ensure availability of retail broadband Internet access service with a download speed of 1.5 Mbps to 87% of the broadband eligible access lines by July 1, 2011. It will ensure availability with a download speed of 3 Mbps to 75% of broadband eligible access lines by July 1, 2010, to 78% of broadband eligible lines by July 1, 2011, and to 80% of broadband eligible lines within 3 years of the close date. Nationwide, our average tele-density is 23 customers per square mile. This commitment ensures availability of broadband even to very rural consumers. The agency should consider the importance of this commitment, as CenturyLink’s continuing investment inevitably will make applications that overlap CenturyLink service areas less viable. CenturyLink has proven, industry-leading experience in deploying broadband networks and services using both wireline and wireless technology, and a strong commitment and focus on rural areas. Today, it serves over 7 million access lines and 2.1 million broadband customers in 33 states.

Submitter: Green Hills Telephone Corp, dba: Green Hills Co’s

Comment: 100% of Green Hills’ territory served will have access to wireless Broadband up to 3 Meg down speeds by year end or no later than first quarter 2010.