

Broadband USA Applications Database

Applicant Name: StarTouch, Inc.

Public Notice Submissions

-----**Service Area:** STARTOUCH NETWORK

Submitter: WaveDivision Holdings, LLC

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

Submitter: Pioneer Communications Company

Comment: Pioneer Communications Company, for and on behalf of itself and its affiliate, Pioneer Telephone Company (the “Company”) opposes the Application to the extent that the proposed funded service area proposed in the Application includes area encompassed by the Company’s broadband service area. The proposed funded service area proposed in the Application appears to include portions of Whitman County, Washington (“Whitman County”) & Adams County (Adams County”). The Company’s broadband service area includes portions of Whitman County & Adams County. Although the Application depicts and describes the portions of Whitman County & Adams County that is encompassed by the Company’s broadband service area as either “unserved” nor “underserved,” that proposed funded service area is not “unserved.” Accordingly, the Company opposes the Application to the extent that it includes the Company’s broadband service area in Whitman County & Adams County as “unserved.”

Submitter: St. John Cooperative Telephone and Telegraph Co.

Comment: St. John Cooperative Telephone and Telegraph Company has no "unserved" or "underserved" areas within its exchange area

Submitter: Suddenlink Communications

Comment: This response conclusively demonstrates that Suddenlink and its competitors already offer broadband service within the mapped area of the applicant's proposed funded service area and that this mapped area is not unserved. 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.