

Broadband USA Applications Database

Applicant Name: McMinnville Access Company

Public Notice Submissions

-----**Service Area:** Willamette Valley

Submitter: Monitor Cooperative Telephone Company

Comment: Applicant erroneously categorizes the entire overlapping service area as unserved. Respondent offers broadband service at speeds up to 6.0 Mbps to 100% of the Applicant's proposed funded service area that overlaps Respondent's service area as depicted in the attached map.

Submitter: St. Paul Telephone Cooperative Association

Comment: St. Paul Telephone Cooperative Association (St. Paul) provides broadband speeds of up to 6.0 Mbps to 100% of the Applicant's entire proposed funded service area overlapping St. Paul's service area.

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: 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 McMinnville Access Company ("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 approximately 57%, 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: Mt. Angel Telephone Company

Comment: Applicant erroneously categorizes the entire service area of Mt. Angel Telephone Company as either unserved or underserved. 100% of the overlapping service area has access to broadband. Our minimum speeds are 3.0 Mbps down/1.0 Mbps up. Customers can purchase up to 10.0 Mbps down. See the attached advertisement for specifics.

Submitter: Gervais Tel. Co. and its subsidiary DataVision

Comment: Applicant erroneously categorizes the overlapping service area of Responent as either under or unserved. Responent offers broadband service at speeds up to 20Mbps down/10Mbps up. In addition, 100% of the GTC/Datavision service area has access to broadband services through a number of service providers. See attached advertizing examples.

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.