

Broadband USA Applications Database

Applicant Name: North Dakota Co. d/b/a SRT

Public Notice Submissions

-----**Service Area:** Wireless

Submitter: Reservation Telephone Cooperative

Comment: RTC currently provides broadband service via DSL and FTTH facilities, with advertised speeds up to 3 Mbps, within the Applicant's proposed service area. According to RTC's analysis of information it has as the incumbent service provider, 100 percent of the residential households in its service area have access to broadband service, as defined in the NOFA, and are capable of being served. RTC's subscriber penetration rate for broadband service is over 48 percent of the households in its service area. Thus, RTC satisfies the three criteria for provision of broadband service, as defined in the NOFA, in the relevant area. Because RTC already meets these criteria, Applicant has erroneously claimed that the proposed service area is "underserved" (or "unserved" for that matter). To the extent that Applicant may argue that it is proposing a mobile broadband service, and/or requests a waiver of the broadband criteria based on this fact, no such waiver is justified. In addition to RTC's wireline services, RTC is also a partner in a cellular partnership with Verizon Wireless that provides mobile broadband to Applicant's proposed service area, with speeds of up to 2 Mbps. The Verizon cellular service provides any commercial services proposed by applicant, and is a more suitable platform for the provision of any mobile broadband services that Applicant proposes to provide.

- The Verizon cellular operation utilizes 3G EVDO technology that is an established path to 4G Long Term Evolution ("LTE"). Verizon has publicly announced its implementation of LTE technology throughout its cellular footprint on an expedited basis, which implementation has already begun; and Verizon has proposed to adapt both its 3G and 4G services to North Dakota's. Verizon's LTE network is expected to deliver average user throughputs of approximately 7-12 Mbps on the downlink and approximately 3-5 Mbps on the uplink.

Thus, RTC already provides broadband services to the portions of Applicant's proposed service area, and participates in the provision of mobile broadband services in that area as well.

RTC has completed or is completing FTTH to portions of their entire service area within 4 years (2013). These projects are already underway and being constructed, some of which are already complete. RTC has an RUS Loan funding over \$34,000,000 in improvements of which are mostly FTTH. As the FTTH is completed, the broadband of at least 3 Mbps area will be expanded to fill in some of the areas in RTCs service area. FTTH adds the capabilities of higher speeds, video services and expanding the area served with high quality FTTH capable of 1000 Mbps.

Submitter: Midcontinent Communications

Comment: While Midcontinent Communications supports the goals of the ARRA and the need to provide service to rural states like North Dakota with limited population densities, Midcontinent has determined that it already provides broadband service to much of the area proposed to be served by this grant. Supporting information for this determination is contained elsewhere in this filing. As the major cable telecommunications provider in the State of North Dakota, Midcontinent has invested private risk capital to interconnect communities with a robust fiber optic network to deliver a wide range of advanced digital and broadband services. Since its initial launch in 1995 when Midcontinent became the first company in the state to offer cable modem broadband Internet services, Midcontinent has continually upgraded services for both business and residential customers throughout its service area. Today the standard Internet speed is 15 Mbps with 25 Mbps available. By the end of 2010, Midcontinent customers will have access to speeds of 50 Mbps. Much of the area that this grant applicant proposes to serve is already served by Midcontinent. As such, this application may not be eligible for grant funding.

Submitter: West River Telecommunications Cooperative

Comment: West River Telecommunications Cooperative (WRT) is providing information regarding the number of residential households and business establishments capable of receiving broadband in the area that the applicant's PFSA overlaps the respondent's service area. WRT is also providing information regarding the number of existing customers purchasing broadband service in the area of overlap. In the area of overlap, greater than 50% of households have access to facilities-based broadband service and the rate of broadband subscribership for residential households and business establishments exceeds 40%. WRT also advertises broadband transmission speeds of at least 3 Mbps downstream within the area of overlap.

Submitter: Turtle Mountain Communications

Comment: United Telecommunications service territory overlaps approximately 11% of the North Dakota Co. d/b/a SRT proposed funded service area (PFSA). SRT designates this area as underserved. In the overlapping area, United service advertises 3 meg service and provides service in the entire overlap. The penetration for United alone is reasonable in the area so when combined with other providers the total penetration maybe over 40%.