Applicant Name: ALABAMA FINANCE DEPARTMENT, INFORMATION SERVICES DIVISION

Public Notice Submissions

Service Area: Alabama Metro-E Network

Submitter: Farmers Telecommunications Cooperative, Inc.

Comment: The Applicant partially requests funding in an area that is served by Farmers Telecommunications Cooperative, Inc. (FTC). In such area, FTC believes it serves approximately thirty-seven percent (37%) of establishments. FTC advertizes broadband speeds of more than 3MBs. FTC provides broadband to approximately forty-six percent (46%) of establishments passed.

Submitter: Pine Belt Telephone Company Inc.

Comment: Pine Belt Telephone Company, Inc. has been offering broadband speed data service to its subscribers for 7 years. The area applied for by the ARRA applicant which falls within the telephone exchange boundary is served with high speed internet broadband service. Pine Belt, through its subsidiary Pine Belt Broadcasting, LLC, also provides fiber broadband interconnectivity to eleven school locations in Orville, Lindon, Sweetwater, Dixon Mills and the Choctaw County School district.

Submitter: James Cable LLC

Comment: James Cable provides 8Mb Broadband service to the communities of Roanoke, Wadley, Rock Mills and Randolph County, Alabama. We provide 3Mb service to the communities of Lineville, Ashland, Gu-Win, Wedowee, Dadeville, Lemar County and Sulligent, Alabama.

Submitter: AT&T

Comment: AT&T is providing data about its wireline and mobile broadband footprint to assist in determining whether the applicant's proposed service area, which may be part of a larger application and project, satisfies the unserved and underserved eligibility requirements.
Additional information regarding other broadband service providers' currently operating in the service area may be needed in order to make a reasonable analysis or a conclusive determination. AT&T has attempted to use the available manual mapping tool, to the best of its ability, to approximately depict its combined wireline and 3G mobile broadband service area footprint overlaid on the Applicant’s proposed funded service area.

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.

Submitter: Millry Communications, Inc.

Comment: Fiber facilities with available services/capacity exists today that can serve seven of the Census Communities that are within our local service area and that are on Hwy 43 to a Southbound route to Mobile. No Ethernet or middle mile funding is necessary to build new facilities or a network in the identified map area. The services can be purchased and utilized today from our company and the area is not underserved from a middle mile or end user prospective.

Submitter: Windstream

Comment: Windstream’s data strongly suggest that the proposed funded service area likely does not qualify as an underserved area. Windstream offers facilities-based, terrestrial broadband service (meeting the definition set forth in the Notice of Funds Availability) to some of the households in 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 underserved.

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 “underserved area” as follows: “Underserved area means a proposed funded service area, composed of one or more contiguous census blocks meeting certain criteria that measure the availability of broadband service and the level of advertised broadband speeds. These criteria conform to the two distinct components of the Broadband Infrastructure category of eligible projects—Last Mile and Middle Mile. Specifically, a proposed funded service area may qualify as underserved for last mile projects if at least one of the following factors is met, though the presumption will be that more than one factor is present: 1. No more than 50 percent of the households in the proposed funded service area have access to facilities-based, terrestrial broadband service at greater than the minimum broadband transmission speed (set forth in the definition of broadband above); 2. No fixed or mobile broadband service provider advertises broadband transmission speeds of at least three megabits per second (“mbps”) downstream in the proposed funded service area; or 3. The rate of broadband subscribership for the proposed funded service area is 40 percent of households or less. A proposed funded service area may qualify as underserved for Middle Mile projects if one interconnection point terminates in a proposed funded service area that qualifies as unserved or underserved for Last Mile projects.”

Submitter: Pine Belt Cellular Inc. dba Pine Belt Wireless

Comment: Pine Belt Cellular, Inc., dba Pine Belt Wireless, has been offering broadband data service to its subscribers for 3 years. The area applied for by the ARRA applicant falls within the franchised, FCC licensed and fixed wireless service areas of Pine Belt Cellular, and is served with high speed internet broadband service.

Submitter: Moundville Telephone Company

Comment: Moundville Telephone Company (“MTC”) is responding to this Public Notice Filing regarding the Alabama Finance Department, Information Services Division’s application for broadband funding under the ARRA. The applicant’s proposed funded service area is encompasses the entire state of Alabama except the major cities and towns and is 52,257 square miles. MTC is an incumbent broadband provider that currently offers broadband service (as defined in the NOFA) to 95% of the overlap with the applicant’s proposed funded service area, as outlined in the response area map. The proposed funded service area overlaps completely with MTC’s incumbent service area, and the applicant claims that the
area is “underserved”. The data provided in this response demonstrates that the applicant’s claim that the proposed funded service area which overlaps with MTC is “underserved” is simply not true.

Submitter:  Troy Cablevision, Inc.

Comment:  Troy Cablevision, Inc. provides high speed Internet at advertised speeds of up to 10 Mbps to the general public in the cities of Troy, Brundidge, Luverne, Elba, Brantley, Goshen, Banks and many small communities in between. We are also aware that in many of these communities we compete with AT&T, Charter Communications, and CenturyTel. As such, we would disagree with the Alabama Finance Department’s assertion that our current service area is underserved.

We are currently expanding our network to serve broadband Internet in the City of Daleville. We are aware that Time Warner currently provides high speed Internet there already.