

Broadband USA Applications Database

Applicant Name: Union Telephone Company

Public Notice Submissions

-----**Service Area:** Wyoming

Submitter: DigitalBridge Communications Corp.

Comment: DigitalBridge Communications (“DBC”) currently offers true 4G, WiMAX broadband service in the applicant’s PFSA, serving an active base of residential and business subscribers in the PFSA. Other companies also serve the PFSA - DBC actively competes with cable (Bresnan) and DSL (Qwest) broadband providers in the PFSA. DBC estimates 5% overlap of its coverage with the large land area PFSA based on households served.

Submitter: Silver Star Telephone Company, Inc.

Comment: Silver Star Telephone Company, Inc. dba Silver Star Communications has served the rural communities of Star Valley, Wyoming and surrounding areas for over 60 years. Silver Star is a leader in providing broadband services to rural America, offering High Speed Internet Services ranging from 256k/128k to 20M/5M within its service territory. Currently, Silver Star offers broadband services with speeds exceeding 768k downstream to over 95% of its service territory. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper infrastructure and via its wireless facilities. Silver Star’s broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star’s investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is considered a premier employer in the area and employs over 60 local residents. Silver Star is committed to enhancing rural residents’ quality of life. Evidence of that commitment can be seen in Silver Star’s community service projects, scholarship program and sustainability initiatives.

Submitter: Bresnan Communications

Comment: Based on our research and exposure in this service area, we’ve concluded that this proposed funded service area fails to meet the NOFA definitions of underserved or unserved as defined in NOFA.

Bresnan, along with other local telcos such as Qwest, provide broadband service in this service area via cable modem and DSL technology. Bresnan provides several tiers of broadband service with download speeds ranging from 1.5mbps to 15mbps.

Our market research and in-depth knowledge of our markets show that we occupy approximately 45-55% of the market share of broadband subscribers in this market, with the remaining distributed among incumbent telcos. With the subscribers and penetration levels entered below, this market area exceeds the penetration and access thresholds as defined in the NOFA, thus making this application ineligible for BTOP/BIP funds in this proposed funded service area.

We have outlined our service areas on the mapping tool provided. Also, see the attached supporting document for additional information regarding our product offering and price points in this market. We also entered confidential and sensitive subscriber details to support our case.

Submitter: RT Communications,Inc

Comment: RT Communications, Inc. (RT) is a 13, 923 access line Incumbent Local Exchange Carrier (ILEC) serving customers in rural Wyoming including the communities of Worland, Thermopolis, Shoshoni, Jeffrey City, Gas Hills, Newcastle, Upton, Moorcroft, Hulett, Osage, Kaycee, Midwest, Burns, Carpenter, Albin, and Pine Bluffs. RT is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout our serving territory. 80 to 90% of RT serving area subscriber households and business locations are capable of broadband speeds greater than 768k/200k DSL today. Approximately 42% of residential households subscribe to the broadband service greater than 768k/200k transmission speeds. Beginning in 2010, DSL speed of 10 mb or greater will be available to FTTH households and businesses. RT's serving area is neither unserved nor underserved as shown in the applicant's proposal.

Submitter: CenturyLink

Comment: 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.

Submitter: Wyoming.com

Comment: We presently serve much of Wyoming with Internet service above 3 Mbps.

Submitter: Gold Star Communications, LLC

Comment: Gold Star Communications, LLC dba Silver Star Wireless (Silver Star) provides 3G Data Services via its EVDO network, ranging in speed up to 3.1Mb/s within at least 80% of its service area. Silver Star has provided mobile wireless carrier services to rural Wyoming and Idaho residents since 2004. Currently, Silver Star provides mobile voice services to over 3,700 rural customers; of those customers 265 subscribe to Silver Star's high-speed data services, and at least 90% of the population within its service area has access to 3G Data Services. Silver Star's wireless mobile 3G services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce while they're on the move. Silver Star is constantly improving its facilities to better serve its customers, while maintaining the delicate balance between affordability and value. Silver Star's commitment to its customers is evident in its dedication to quality, reliability and price.

Submitter: All West Communications

Comment: All West Communications provides broadband DSL and Ethernet services to Evanston, Bear River, Woodruff, Sage and Cokeville.

Submitter: James Cable LLC

Comment: James Cable LLC provides 8Mb broadband service to the communities of Lingle, Torrington, Goshen County, and Douglas, Wyoming. We provide 5Mb service to the communities of Glenrock, Rolling Hills, Wheatland, and Platte County. We provide 3Mb service to Lusk.

Submitter: Sweetwater Cable Television

Comment: Sweetwater Cable TV, Inc provides service to the following Census tracts located in the towns of Rock Springs and Green River, county of Sweetwater, State of Wyoming: 970500, 970601, 970602, 970800, 970901, 970902, 970903, 971000, 971100, 971200. Approximately 99% of all households in our service area have access to broadband service.

Submitter: Inventive Wireless of Nebraska, LLC dba Vistabeam

Comment: Union Telephone Company has proposed a project that includes several service areas that are already served with 3meg or faster broadband by Vistabeam and multiple other broadband providers. Vistabeam provides service to 32 towns in the Nebraska Panhandle and Eastern Wyoming.

Submitter: Dubois Telephone Exchange, Inc.

Comment: Dubois Telephone Exchange, Inc. (DTE) is an Independent Local Exchange Carrier (ILEC) serving 2,500 access lines in rural northwest and south-central WY, including the Fremont County communities of Dubois and Crowheart; and the Carbon County communities of Baggs, Dixon and Savery. DTE is an active RUS borrower, currently engaged in an extensive FTTH upgrade throughout its serving areas. 90-95% of DTE serving area subscriber households and business locations are capable of 3mb DSL service today. Approximately 54% of DTE residential households in the applicant's proposed funded service area already subscribe to 3mb or 1.5 mb service today. Beginning in 2010, DSL speeds of 10mb or faster will be available to FTTH households and businesses. The applicant's proposed funded service area that overlaps DTE's service area in Wyoming is not underserved as represented in the applicant's proposal.

Submitter: Columbine Telephone Company, Inc.

Comment: Columbine Telephone Company, Inc. dba Silver Star Communications (Silver Star) has served the Teton Valley, ID community for over ten years, following its purchase of the service area from a large telecom carrier. Since that time, Silver Star has continued to be a leader in providing broadband service to rural America. Silver Star offers Broadband Services with speeds exceeding 768k downstream to over 95% of its service territory, with High Speed Internet Services ranging from 256k/128k to 20M/5M. Silver Star strives to offer the latest broadband technologies via its robust fiber and copper

infrastructure and via its wireless facilities. Silver Star's broadband services enable its customers, residential and commercial, to connect to the world quickly and reliably in order to access information, entertainment, and commerce. Silver Star is constantly improving its facilities and upgrading its service offerings, while maintaining the delicate balance between affordability and value. Silver Star's investment in its facilities reaches beyond merely providing broadband services to its customers. Silver Star is committed to enhancing rural residents' quality of life, through employing local residents, participating in company-sponsored community service projects, its scholarship program, and its sustainability initiatives.

Submitter: Tri County Telephone Association, Inc.

Comment: The filing of Union Telephone Company indicates all of the certificated service area of Tri County Telephone Association, Inc., and its subsidiary TCT West, Inc., are "underserved," when, in fact, all of the customers of the two companies have access to a minimum of 1 megabit per second broadband service (both downloading and uploading). Further, most customers have access to at least 13 megabits per second service. Finally, the area is also served by two wireless entities, both of which offer broadband service at speeds up to 1.5 megabits per second.

Submitter: Range Telephone Cooperative

Comment: Range Telephone Cooperative, Inc. (Range) is an Independent Local Exchange Carrier (ILEC) serving 2235 access lines in rural Northeastern Wyoming. Range service area includes Johnson, Crook, Weston, Campbell and Sheridan Counties. Range is an active RUS borrower with loan funds due for completed projects and loan funds being requested for new projects and upgrades. Range will start a 5 yr RUS construction plan in 2010 to place buried fiber optic cable in various locations within Range's service area to enhance existing broadband backhaul and provide future FTTH. 73% of Range's serving area subscriber households and business locations are capable of 3mb service today. Approximately 52% of Range residential households in the applicants proposed funded service area already subscribe to 3 mb or 1.5 mb service today.

The applicant's proposed funded service area that overlaps Range's service area in Wyoming is not unserved or underserved as represented in the applicant's proposal.

With respect to Union Telephone Company's application for broadband funds support in Wyoming, their comments that the areas are unserved or underserved are not true. The areas Range serves that were applied for in their application are capable of 1.5 mb or higher broadband service to the households that

we serve. The area we serve is very rural but we still are trying to meet our customer's broadband needs.

Range has been providing excellent communication services to this area for over 40 years. Range used RUS loan funds to build the infrastructure in this area to get customers communication service. Range is a Cooperative that is owned by its members and they get the same high quality communication services. We are currently in the process of upgrading our backbone fiber with electronics that will further improve the broadband services in this area. We will utilize RUS loan funds from our recent application (not stimulus related) to eventually try to get our members/customers 100 mb of broadband in the next 4 to 5 years.

Range is very sensitive to its member/owner's needs and we have focused the majority of our efforts on improving broadband services to them. Union Telephone Company's comments that much of the area that they applied for is unserved or underserved are not true in the case of our service area in Wyoming. Range has 6 employees that already reside in the state and service those customers professionally. Our rates are very affordable and competitive.