

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Domestic Section 214 Application Filed for)	
the Transfer of Control of Hospers)	WC Docket No. 18-129
Telephone Exchange, Inc. d/b/a HTC)	
Communications to Mutual Telephone)	
Company of Sioux Center, Iowa d/b/a)	
Premier Communications)	

**JOINT COMMENTS OF NTCA–THE RURAL BROADBAND ASSOCIATION
AND THE IOWA COMMUNICATIONS ALLIANCE**

NTCA–The Rural Broadband Association (“NTCA”)¹ and the Iowa Communications Alliance (“The Alliance”)² hereby submit these comments in response to the Commission’s Public Notice seeking comment on the application filed by Hospers Telephone Exchange, Inc. d/b/a HTC Communications (“Hospers”) and Mutual Telephone Company of Sioux Center, Iowa d/b/a Premier Communications (“Mutual”) requesting approval to transfer control of Hospers to

¹ NTCA represents nearly 850 independent, community-based telecommunications companies and cooperatives and more than 400 other firms that support or are themselves engaged in the provision of communications services in the most rural portions of America. All of NTCA’s service provider members are full service rural local exchange carriers and broadband providers. Approximately 75 percent serve as multichannel video programming distributors using a variety of technologies in sparsely populated, high-cost rural markets.

² The Alliance is the voice of Iowa’s rural communications industry representing more than 120 providers that offer voice service via landline, wireless, TDM, VoIP and other technologies. As the premier leader in education, advocacy and training for Iowa’s rural communications industry, the Alliance represents nearly all certificated incumbent, rate-of-return local exchange carriers in Iowa.

Mutual (“Application”).³ NTCA and The Alliance support the requested transfer of control as it is in the public interest and is not detrimental to other telecommunications providers.

Hospers is the Incumbent Local Exchange Carrier (“ILEC”) for one Iowa exchange and the Competitive Local Exchange Carrier (“CLEC”) for four Iowa exchanges, through which Hospers provides local and long distance telephone service, video and high-speed Internet service. Mutual provides telephone, video and high-speed Internet service through its ILEC and CLEC subsidiaries to Iowa communities that are adjacent to, or contiguous with, Hospers’ exchanges.⁴ The requested transfer will have no impact on other telecommunications providers and will benefit Hospers’ customers by allowing them to continue to receive reliable voice, video and high-speed Internet service from a company familiar with their community at rates consistent with those currently offered by Hospers. Furthermore, as noted in the Application, the requested transfer of control will result in greater efficiencies while allowing Mutual to effectively serve customers in all of the locations currently served separately by Hospers and Mutual.

Like Hospers, Mutual has a long and celebrated history of supporting its community and investing in technologies needed for residents and businesses to thrive. In 2014, Mutual received a Smart Rural Community Showcase Award from NTCA, and in 2015, NTCA recognized

³ *Domestic Section 214 Application Filed for the Transfer of Control of Hospers Telephone Exchange, Inc. d/b/a HTC Communications to Mutual Telephone Company of Sioux Center, Iowa d/b/a Premier Communications*, WC Docket No. 18-129, Public Notice, DA 18-569 (rel. June 1, 2018) (“Public Notice”).

⁴ Mutual and Hospers’ service areas overlap only in the Sibley exchange, where Mutual provides ILEC service and Hospers provides CLEC and cable service. As described in the Application, Sibley has a population of approximately 2,798, well within the exception contained in Section 652(d)(1) of the Commission’s Rules permitting local exchange carriers to merge with cable operators operating in the same service area if the population does not exceed 35,000 inhabitants.

Mutual as a Certified Gig-Capable Provider.⁵ To achieve these recognitions, Mutual invested \$13,500,000 in dedicated fiber optic facilities and terminating electronics, including a 10 Gbps backbone interface and local fiber to the home networks. Mutual worked closely and carefully with customers to complete the upgrade from copper to fiber facilities because portions of customers' property often had to be excavated to allow necessary equipment to be installed at each home and business within Mutual's service area. As a result of Mutual's careful, customer-oriented approach, Mutual was able to install fiber throughout the community and surrounding rural areas. Mutual also collaborated with city officials to incorporate a "dig once" policy, which designates that for all new construction, the fiber cable will be placed in easements when other utilities are installed.

⁵ Smart Rural Community ("SRC") Showcase Awards are presented to NTCA members to recognize their extraordinary achievements in promoting rural broadband networks and applications in rural communities. Awards are based on the demonstrated use of these technologies to support innovative economic development, education, health care, and other vital public functions. To be certified by NTCA as a Gig-Capable provider, a member company must certify and provide accompanying information to confirm that gigabit technology is currently commercially available within portions of a given service area.

As noted above, customers served by Hospers and Mutual will benefit from the requested transfer through more efficient operations and Mutual's demonstrated commitment to the communities it serves. Accordingly, NTCA and The Alliance urge the Commission to expeditiously grant the Application.

Respectfully submitted,



THE VOICE FOR
CONNECTIVITY

By: /s/ Michael R. Romano
Michael R. Romano
Senior Vice President –
Industry Affairs & Business Development
mromano@ntca.org

By: /s/ Dave Duncan
Dave Duncan
CEO
dduncan@iowacommunicationsall.com

4201 Westown Parkway, Suite 130
West Des Moines, IA 50266
515/867-2091

By: /s/ Tamber Ray
Tamber Ray
Regulatory Counsel
tray@ntca.org

4121 Wilson Boulevard, Suite 1000
Arlington, VA 22203
703/351-2000

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