

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Notice of Additional Coverage in Census Blocks	)	WC Docket No. 10-90
Deemed Initially Eligible for Support	)	
Connect America Fund Phase II Auction	)	
	)	

**COMMENTS OF  
HARRON COMMUNICATIONS, L.P.**

Harron Communications, L.P. (“Harron” or the “Company”) files these comments pursuant to the Wireline Competition Bureau’s (“Bureau”) recent Public Notice requesting that unsubsidized competitors notify the Bureau of census blocks served by such unsubsidized competitors which are identified on the preliminary list of areas eligible for support under the Connect America Fund Phase II auction (“CAF Phase II Auction”). There are thirty-three (33) census blocks that Harron, through its subsidiaries,<sup>1</sup> currently serves which are included on the Bureau’s preliminary list. Because Harron currently provides qualified broadband and voice service in these thirty-three census blocks, Harron respectfully requests that the Bureau remove these census blocks from the list of areas eligible for support in the CAF Phase II Auction.

On August 10, 2016 the Bureau published a preliminary list of census blocks deemed initially eligible for support under the CAF Phase II Auction.<sup>2</sup> The Bureau’s preliminary list of eligible blocks includes 33 census blocks in which Harron, through its subsidiaries, recently (since June 30, 2015) deployed broadband and voice services meeting the performance and

---

<sup>1</sup> The Harron subsidiaries are MetroCast Cablevision of New Hampshire, LLC (FRN 0003784063), and Gans Communications, L.P. d/b/a MetroCast Communications (FRN 0007609514 and FRN 0018547471).

<sup>2</sup> Wireline Competition Bureau Releases Preliminary List and Map of Eligible Census Blocks for the Connect America Fund Phase II Auction; WC Docket No. 10-90, DA 16-908 (rel. Aug. 10, 2016) (hereafter “Public Notice”).

pricing metrics set forth in Commission rules. Specifically, Harron, through its subsidiaries, provides broadband service in these blocks at speeds of at least 10/1 Mbps, with a minimum usage allowance of at least 150 GB/month, at a round-trip latency of 100 ms or less, and at a price that is reasonably comparable to rates in urban areas.<sup>3</sup> Harron also provides voice service in these blocks at a price that is reasonably comparable to rates in urban areas.

Harron has deployed broadband and voice services in these blocks since June 30, 2015 in two phases. Initially, Harron deployed broadband and voice to nineteen (19) census blocks prior to December 30, 2015. Those blocks were reported as served on the Company’s certified Form 477 filings filed on January 6, 2016. These blocks are set forth in Table 1 below.

**Table 1 – Census Blocks Served by Harron as of December 31, 2015**

<b>Census Blocks Served as of December 31, 2015</b>	<b>FRN</b>	<b>Form 477 Filing Date</b>
420792161001000	0007609514	1/6/2016
420792168002020	0007609514	1/6/2016
510579507001003	0018547471	1/6/2016
510579507001024	0018547471	1/6/2016
511030303003046	0018547471	1/6/2016
511159513003094	0018547471	1/6/2016
511159513004055	0018547471	1/6/2016
511199512002010	0018547471	1/6/2016
511330201002324	0018547471	1/6/2016
511330201003032	0018547471	1/6/2016
511330202001193	0018547471	1/6/2016
511330202003016	0018547471	1/6/2016
511330203002013	0018547471	1/6/2016
511330203003119	0018547471	1/6/2016
511330203005161	0018547471	1/6/2016
511330203006037	0018547471	1/6/2016
511590401003029	0018547471	1/6/2016
511930101003018	0018547471	1/6/2016
511930101003047	0018547471	1/6/2016

<sup>3</sup> See, e.g., *2014 Measuring Broadband America Fixed Broadband Report*; A Report on Consumer Fixed Broadband Performance in the U.S.; Office of Engineering and Technology and Consumer and Governmental Affairs Bureau at 16 (updated June 18, 2014) (describing average latency of cable broadband services well below 100 ms).

Subsequently, Harron deployed broadband and voice to fourteen (14) additional census blocks prior to June 30, 2016. These blocks are reported as served on the Company’s most recent Form 477 filings (submitted on July 11, 2016). These blocks are set forth in Table 2 below.

**Table 2 – Census Blocks Served by Harron as of June 30, 2016**

<b>Census Blocks Served as of June 30, 2016</b>	<b>FRN</b>	<b>Form 477 Filing Date</b>
330170860001079	0003784063	7/11/2016
420370502002012	0007609514	7/11/2016
420370514002036	0007609514	7/11/2016
420792164001012	0007609514	7/11/2016
510579508001038	0018547471	7/11/2016
510579508002049	0018547471	7/11/2016
511159514002100	0018547471	7/11/2016
511330201002023	0018547471	7/11/2016
511330201003030	0018547471	7/11/2016
511330202003037	0018547471	7/11/2016
511330203003023	0018547471	7/11/2016
511330203005137	0018547471	7/11/2016
511590402001083	0018547471	7/11/2016
511930101003038	0018547471	7/11/2016

The Commission has previously explained its intent to provide support for broadband deployment only in those “areas that are *unserved* by any broadband provider.”<sup>4</sup> Directing CAF support or other subsidies to providers proposing to serve areas already served by Harron, an unsubsidized competitor, would conflict with the Commission’s goals of competitive neutrality, and undermine Harron’s significant network investments (supported by private capital) in these

---

<sup>4</sup> *In re Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 at ¶ 137 (2011) (*CAF Order*) (emphasis added).

areas.

For the reasons set forth herein, Harron respectfully requests that the Commission remove such census blocks from the current list of “unserved” blocks and decline to direct any CAF subsidies to any service providers proposing to operate in these areas.

Respectfully,

A handwritten signature in black ink, appearing to read 'K.C. Halm', written in a cursive style.

K.C. Halm  
Davis Wright Tremaine LLP  
1919 Pennsylvania Avenue, NW, 800  
Washington, D.C. 20006  
(202) 973-4287  
[kchalm@dwt.com](mailto:kchalm@dwt.com)

*On behalf of Harron Communications, L.P.*

August 30, 2016