

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

In the Matter of)
) WC Docket No. 10-90
Connect America Fund)

CAF PHASE II AUCTION CHALLENGE

COMMENTS OF CONSOLIDATED COMMUNICATIONS NETWORKS, INC.

Consolidated Communications Networks, Inc. (“CCNI” or the “Company”) hereby submits these comments regarding the Federal Communications Commission’s (“FCC” or “Commission”) August 10, 2016 Public Notice which published the preliminary list of census blocks eligible for Connect America Fund (“CAF”) Phase II support via a forthcoming competitive auction.¹ CCNI is a competitive local exchange carrier (CLEC) providing service in rural western North Dakota. CCNI reviewed the preliminary list of eligible census blocks and discovered three blocks where the Company provides voice and broadband service as an unsubsidized competitor that meet the Commission’s technical and pricing criteria. As such, CCNI requests that the three blocks listed below be removed from eligibility for CAF Phase II support.

CCNI began providing service in census blocks 380899640002069, 380899640002077, and 380899640002145 on January 1, 2016. CCNI will report these blocks on its June 2016 Form 477 data submission, to be filed and certified on September 1, 2016. However, due to the service initiation date, they were not reported on the previous Form 477 filings that the Commission relied upon to compile its list of eligible census blocks. In the *Public Notice*, the Commission

¹ See Wireline Competition Bureau Releases Preliminary List and Map of Eligible Census Blocks for the Connect America Phase II Auction, WC Docket No. 10-90, Public Notice DA 16-908 (rel. Aug. 10, 2016) (“*Public Notice*”).

states, “we invite price cap carriers and unsubsidized competitors to notify us...that since June 30, 2015 they have newly deployed broadband at 10/1 Mbps speeds or greater, with a minimum usage allowance of 150 GB at a rate meeting the Commission’s current reasonable comparability benchmark, with latency not exceeding 100 ms, in census blocks that are included in this preliminary list.”² CCNI can provide broadband speeds of up to 1 Gbps via fiber-to-the-home in these census blocks. CCNI’s broadband service offerings have unlimited usage allowance and meet the latency standard. Rates meet the reasonable comparability benchmark.

The attached Declaration by an officer of CCNI attests to these facts and should be accepted as evidence that the Company provides service in the three census blocks, which will also be reflected on the Company’s June 2016 Form 477 data. CCNI respectfully requests that the blocks be removed from eligibility for CAF Phase II auction support.

Respectfully submitted,

/s/ Ken Weisenberger

Ken Weisenberger, Chief Financial Officer
Consolidated Communications Networks, Inc.

Filed August 31, 2016

Attachment

² Public Notice at 4.

DECLARATION OF KEN WEISENBERGER

I, Ken Weisenberger, am Chief Financial Officer of Consolidated Communications Networks, Inc. (“CCNI”). I have personal and direct knowledge of the representations made by Consolidated in its Connect America Fund Phase II Comments in response to the Federal Communications Commission’s August 10, 2016 Public Notice (DA 16-908). I verify the truth and accuracy of the information contained in CCNI’s comments. I verify that CCNI is an unsubsidized provider of voice and broadband in the census blocks listed below. CCNI’s services in these census blocks meet the Commission’s performance and pricing criteria and should not be eligible for support in the Connect America Fund Phase II auction.

Census Blocks:
380899640002069
380899640002077
380899640002145

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 31, 2016



Ken Weisenberger, Chief Financial Officer
Consolidated Communications Networks, Inc.