Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Wireline Competition Bureau Releases Preliminary	)	WC Docket No. 10-90
List and Map of Eligible Census Blocks for the	)	FRN 0014021364
Connect America Phase II Auction	)	

To: Chief, Wireline Competition Bureau

COMMENTS OF ALYRICA NETWORKS, INC.
IN RESPONSE TO PUBLIC NOTICE

Alyrica Networks, Inc. ("Alyrica"), by its attorneys and pursuant to Sections 1.415 and 1.419, hereby submits these Comments in response to the August 10, 2016 Public Notice of the Wireline Competition Bureau ("Bureau") in the above-referenced docket ("*Public Notice*").[1] The *Public Notice* seeks comment on the preliminary list of census blocks deemed to be eligible for competitive bidding in the Connect America Fund Phase II auction. Alyrica herein provides information substantiating its offering of voice and broadband service at 10/1 Mbps or greater, a minimum usage allowance of 150 GBs at a rate meeting the Commission's reasonable comparability benchmark, and latency meeting 100 ms to those census blocks that are currently listed as unserved.[2] Accordingly, these census blocks should be excluded from the list of blocks available for competitive bidding in the upcoming auction.[3]

Discussion

Alyrica is a provider of fixed wireless Internet access services in the Willamette Valley of Oregon. Over the last several years, Alyrica has achieved rapid growth of its systems and has increased its market share. In a number of areas, Alyrica offers the only terrestrial broadband

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[1] *See Public Notice*, "Wireline Competition Bureau Releases Preliminary List and Map of Eligible Census Blocks for the Connect America Phase II Auction," DA 16-908 (rel. Aug. 10, 2016).
[2] *See id.* at 4.
[3] ALYRICA also is updating its form 477 to reflect its offering of service to these census blocks.

service. It recently began offering residential voice service throughout its broadband service area..

Attached hereto is the Declaration of Kevin Sullivan, President of Alyrica. Mr. Sullivan explains that, as of August 15, 2016, Alyrica is offering voice and broadband service that meets the Commission's voice and broadband service criteria to census blocks that are not shown on the list linked to the *Public Notice*. Accompanying Mr. Sullivan's Declaration are exhibits containing a list of the census blocks and other documentation demonstrating that Alyrica is offering voice and broadband service that meets the Commission's requirements of at least 10/1 Mbps speeds or greater, a minimum usage allowance of 150 GBs at a rate meeting the Commission's reasonable comparability benchmark, and latency of 100 ms or lower.

Alyrica continues to undertake ongoing construction activities and to deploy and offer voice and broadband service obligations that meets the Commission's requirements for being an "unsubsidized competitor." Based on its updating of Form 477 and the documents accompanying these Comments, Alyrica respectfully asks the Bureau to remove from the preliminary list of census blocks those blocks listed in the exhibit to Mr. Sullivan's attached Declaration, and declare these census blocks ineligible for CAF competitive bidding.

Respectfully submitted,

ALYRICA NETWORKS, INC.

By: */s/ Stephen E. Coran*
Stephen E. Coran

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2001 L Street, NW, Suite 400
Washington, DC 20036
(202) 416-6744
Its Attorneys

August 31, 2016

Declaration of Kevin Sullivan

My name is Kevin Sullivan, and I am the President of Alyrica Networks, Inc. ("Alyrica"). This Declaration and the attachments hereto provide factual support for the deletion of census blocks from the preliminary list of eligible census blocks that the Commission identified in its August 10, 2016 Public Notice (DA 16-908). In addition to this Declaration, Alyrica is updating Form 477 to report that it is providing eligible voice and broadband service (as defined below) to those subscribers in those census blocks that were not previously reported on FCC Form 477. This information is current as of August 15, 2016.

I hereby declare under penalty of perjury that the statements of fact set forth herein are true and correct to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these facts.

1. Alyricais an unsubsidized competitor that provides facilities-based terrestrial residential fixed wireless broadband and voice service to subscribers in the Willamette Valley of Oregon. Alyrica relies on spectrum to provide its voice and broadband service.

2. Attached as Exhibit A hereto is a list of the census blocks where Alyrica offers voice and broadband service that meets or exceeds the following criteria: (a) speeds of at least 10 Mbps downstream and 1 Mbps upstream, (b) at least 150GB monthly usage allowance, (c) round-trip latency of 100 milliseconds or less measured from the customer premises to the closest Internet core peering interconnection point and back to the customer premises, and (d) broadband and voice pricing at levels reasonably comparable to the pricing for similar broadband service in nearby urban areas (collectively, "eligible voice and broadband service").

3. Exhibit B hereto contains screen shots of Alyrica's web pages showing the pricing plans for voice and broadband. As can be seen, the monthly price for our residential voice service is $14.99 and the monthly price for our 12 Mbps broadband service is $69.99. The upload speed for this service is at least 1 Mbps. These prices are below the reasonable comparability benchmark of $41.07 for voice and $71.17for broadband.

4. Exhibit C hereto contains a map showing Alyrica's coverage. The map was generated by Towercoverage.com at Alyrica's request for a map showing a -67 dbi signal or better. Alyrica provided propagation data to the Towercoverage.com site (e.g., radio, antenna type, tower location, downtilt, azimuth), and Towercoverage.com then created the coverage map for us. Based on this data and Alyrica's track record of using spectrum resources to serve consumers, Alyrica can offer eligible voice and broadband service to customers in these census blocks.

5. In sum, in each subject census block, Alyrica holds itself out to the public as able and willing to provide eligible voice and broadband service. In each subject census block, Alyrica determined that it is offering eligible voice and broadband service because Alyrica currently has (or formerly had) a subscriber in the census block and/or used a third party RF propagation calculator from Towercoverage.com that predicts a sufficient signal in that census block to provide service with our standard client equipment. In each such census block, Alyrica is willing and able to provision eligible voice and broadband service to such customers within seven to ten business days without an extraordinary commitment of resources and without any special construction charge or construction fee to consumers.

Kevin Sullivan

08-31-16

Date

Exhibit A

CAF-prelim listed blocks that are served by Alyrica

410030001004010
410030004002000
410030006003039
410030101004005
410030101004041
410030102001016
410030102001022
410030102001023
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410030104001004
410030104001007
410030104001028
410030104001029
410030104001035
410030104001040
410030104001053
410030104001058
410030104001061
410030104001081
410030104001082
410030104001084
410030106004003
410030107021007
410030107022000
410030107022010
410390003001011
410390003001026
410390003001029
410390003001033
410390003001036
410390003001038
410390003001058
410390004031005
410390004042024
410430201001004

410430201002000
410430201002016
410430201002023
410430201002049
410430201002050
410430201002056
410430201002068
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410430201002073
410430201002076
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410530204005131

Exhibit B

Alyrica Internet - Serving

site.alyrica.net/voice

ALYRICA

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Business

PBX

Residential Phone

Say "Goodbye" to taxes and fees!

Our residential phone service provides one phone line for a single, flat-rate fee. We'll take care of all those pesky taxes and fees for you. Nothing hidden, no surprises.

No need to buy a new phone. With our service, you can use your existing telephone.

Eliminate one of your bills. When your phone service uses your Internet connection, you have one less bill to worry about each month.

Benefits and Features

- Free Long Distance
- No Taxes or Fees
- Caller ID
- Call Waiting
- Voice Mail

$ 14.99/month

How does it work? | Back to Top

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Your powerful, advanced workhorse!

Our hosted pbx phone service provides the advanced features your growing business needs. One of the latest spin offs of business telecom technology is the Hosted PBX. This technology allows small and medium-sized businesses to have a sophisticated telephone system without the investment in telephone equipment.

In fact, the entire telephone system is operated and maintained by your Voice-over-IP (VoIP) service provider. A Hosted PBX lets

Benefits and Features

- Initial and Ongoing Cost Savings
- Geographical Flexibility
- Scalability
- Quick Setup
- Ease of Use
- Free Long Distance

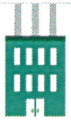
$ 29.99/seat

Alyrica Internet - Serving

site.alyrica.net/internet

Home

Business



Industrial

View Our Coverage

Home Internet

Our home Internet service provides reliable speeds at an affordable price.
There are no hidden taxes, fees, or rental charges applied, so the price listed below is the price you pay for 24 months, no surprises. This service includes ESPN3.

Pick your plan

Wireless Plans (Available throughout our coverage area)

Economy
Designed for basic web browsing and E-Mail usage.
Max download: 1.5 Mbps
$ 29.99/month

Basic
Browse the web, watch YouTube, hang out with friends on Facebook.
Recommended Devices: 2
Max download: 3 Mbps
$ 39.99/month

Standard
Designed for standard definition video streaming of Netflix, Hulu, and Amazon Prime services.
Recommended Devices: 3
Max download: 8 Mbps
$ 55.99/month

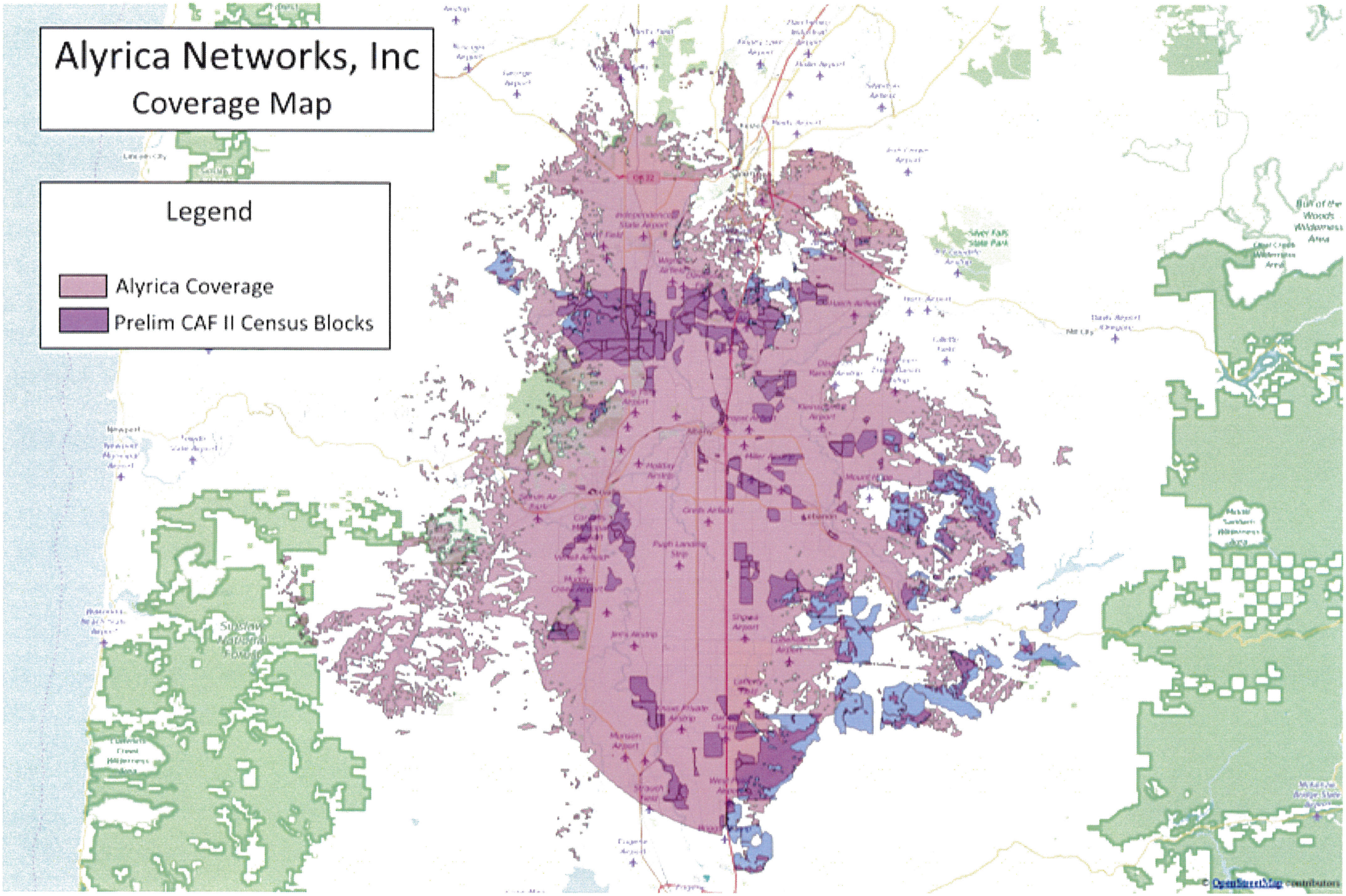
Enhanced
Designed for high definition (720P and 1080P) video streaming content.
Recommended Devices: 4
Max download: 12 Mbps
$ 69.99/month

Gaming
Low latency, high bandwidth account for the dedicated gamer.
Recommended Devices: 5
Max download: 20 Mbps
$ 99.99/month

Extreme
Designed for users who need the fastest of speeds.
Recommended Devices: 6
Max download: 40 Mbps
$ 149.99/month

Installation is free with a 24 month contract. Contract-free installation is $99 plus $5/month added to the prices shown above.

How does it work? | View our coverage

Exhibit C

Alyrica Networks, Inc
Coverage Map