



September 11, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Connect America Fund, WC Docket No. 10-90
Comments on Preliminary Determination of Rate-of-Return Study Areas
100 Percent Overlapped by Unsubsidized Competitors

On August 11, 2017, the Wireline Competition Bureau ("Bureau") released its preliminary determination of rate-of-return study areas that are 100 percent overlapped by an unsubsidized competitor.¹ Vantage Point Solutions, a consultant for Monon Telephone Company ("Monon Tel"), files these comments to dispute the Bureau's preliminary determination.

In the Public Notice, the Bureau preliminarily determined Monon Tel's study area in Indiana (SAC:320790) is 100% overlapped by an unsubsidized competitor, Transworld Network Corp. ("Transworld"). As shown in a sworn statements by Cheryl Delph and JoEllen Sheffer, who made preliminary inquiries regarding Transworld's service in Monon Tel's study area and found that Transworld is unable to provide qualified service to all locations in at least 4 census blocks (181819583001006, 181819582002006, 181819584001000, and 181819582001037). Please see the following four sworn statements as evidence.

For the reasons set forth herein, Vantage Point Solutions on behalf of Monon Tel submits that the Bureau's determination is incorrect. This evidence indicates Monon Tel is not 100% overlapped by an unsubsidized competitor and not subject to the elimination of high-cost universal service as adopted in the 2011 USF/ICC Transformation Order.

Regards,


/s/ Heath Koth

Heath Koth
Senior Financial Analyst
Vantage Point Solutions

¹ Public Notice, DA 17-760, August 11, 2017

In the Matter of)
) WC Docket No. 10-90
Wireline Competition Bureau)
Publishes Preliminary Determination)
of Rate-of-Return Study Areas 100 Percent)
Overlapped by Unsubsidized Competitors)

I, Cheryl Delph, being of lawful age and duly sworn, state as follows:

- 
Cheryl Delph

Declarant

4672 N 400 W
Wolcott IN 47995

Recy transfer to
Sales



Service Request Instructions and Call Notes

Thank you for helping your local telecommunications company test competitor coverage. If you have any questions about this process, please contact Heath Koth at Vantage Point Solutions (heath.koth@vantagepnt.com, 605-995-1832).

Your goal is to inquire about securing service without broadcasting to the competitor this is part of a test. Take good notes while you are on the phone. After the call is completed, Vantage Point Solutions will type up your notes, have you sign an affidavit and file them with regulators.

Date 8-31-17 Time 9:31

1. Opening

Let the customer service representative (CSR) know you are interested in getting wireless Internet service. They will probably ask for your name and address. Feel free to provide that information.

The CSR may indicate they **cannot** provide service in your area. If that is the case, complete this section:

☐ CSR indicated they **cannot** provide service in my area.

Reason given: _____

2. Identifying Options

Ask the CSR what Internet speed packages and prices they offer. Record what he/she tells you.

Yes
1 up to 4 49.95
1.5 up to 6 79.95

Is there a package (either residential or business) offering 10 Megabits per second (often referred to as "10 meg") or more?

If NO, thank them for their time and hang-up. Call completed at (time): Business 50 per
If YES, continue with the call.

3. Terms and Conditions

Ask the CSR for information on these items:

Is there an installation fee? How much? Do those fees change with a longer-term contract?

1 yr NO install there should be a fee
99.00 if no plan

Do you have to purchase equipment? How expensive? Do those fees change with a longer-term contract?

they provide router

Is there a cancellation fee? How expensive? Do those fees change with a longer-term contract?

1st contact 3 months

Are there any money back guarantees? What are the details?

find terms + cond on web site
Wipower.com

4. Service Quality

Ask the CSR for information on service quality. Do they have good service? Where is the tower that will serve your home?

Direct line
of site unless
stated

3 towers in
this
area

5. Voice Service

Ask the CSR if you will be able to get a telephone and a phone number with your service.

☒ Yes, they have voice service.

25.05 on top of what ever service

☐ No, they do not have voice service.

with

Ask the CSR if you can keep your current phone number.

☐ Yes, I can keep my phone number.

maybe they have to check

☐ No, I cannot keep my phone number.

Do not sign up for voice service. Tell the CSR, if they press, that you were just curious about how that worked.

6. Service Timing

Ask the CSR when they would be able to get you connected. Record what they tell you.

3 weeks to 4

If they give you only a general answer, ask them how long it normally takes them to connect someone once service is ordered. Record what they tell you.

7. Call Conclusion

Thank the CSR for their time and tell them you want to think about it.

Call completed at (time): 9:35

8. Reporting Back Your Information

Call or email the following at Vantage Point Solutions to provide the information you have gathered:

Heath Koth, 605-995-1832, heath.koth@vantagepnt.com

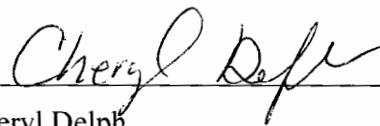
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Overlapped by Unsubsidized Competitors)

SWORN STATEMENT OF CHERYL DELPH

I, Cheryl Delph, being of lawful age and duly sworn, state as follows:

1. My name is Cheryl Delph.
2. At 9:24 am on 08/29/17, I called Transworld Network, Corp. to inquire about getting service at 10116 N 450 W, Rensselaer, IN 47978. I have attached my notes from my call with Transworld Customer Service Representative and have labeled it "Attachment A."
3. I called the Transworld Customer Service Representative number 1-800-950-3015.
4. I spoke with the Customer Service Representative who informed me I have 2 residential service options:
 - 1 Mb up to 4 Mb for \$49.95
 - 1.5 Mb up to 6 Mb for \$79.95
5. The Customer Service Representative mentioned there is a business option of 10 Mb download speeds but the price is \$50.00 per Mb a month, which totals \$500.00 per month.
6. The Customer Service Representative also told me it would take 3 weeks for the service to be installed at this residence.
7. The called ended at 9:30 am.
8. This completes my Sworn Statement.



Cheryl Delph
Declarant

Business can
get 10/10 not
Res

10116 N 450 W
Rensselaer IN
47978



Service Request Instructions and Call Notes

CH-1

Thank you for helping your local telecommunications company test competitor coverage. If you have any questions about this process, please contact Heath Koth at Vantage Point Solutions (heath.koth@vantagepnt.com, 605-995-1832).

Your goal is to inquire about securing service without broadcasting to the competitor this is part of a test. Take good notes while you are on the phone. After the call is completed, Vantage Point Solutions will type up your notes, have you sign an affidavit and file them with regulators.

800-950-3015

Sales Dept

Date 8-29-17 Time 9:24 am

1. Opening

Let the customer service representative (CSR) know you are interested in getting wireless Internet service. They will probably ask for your name and address. Feel free to provide that information.

The CSR may indicate they **cannot** provide service in your area. If that is the case, complete this section:

☐ CSR indicated they **cannot** provide service in my area.

Reason given: _____

2. Identifying Options

Ask the CSR what Internet speed packages and prices they offer. Record what he/she tells you.

^{always}
Pricing up to 4 49.95
1.5 up to 6 ~~49.95~~ 79.95

Is there a package (either residential or business) offering 10 Megabits per second (often referred to as "10 meg") or more?

If NO, thank them for their time and hang-up. Call completed at (time): 9:31

If YES, continue with the call.

\$50 per meg

* Business only

10/10
250.00

3. Terms and Conditions

Ask the CSR for information on these items:

Is there an installation fee? How much? Do those fees change with a longer-term contract?

1 yr free term

no term 99.99

Do you have to purchase equipment? How expensive? Do those fees change with a longer-term contract?

no equipment

Is there a cancellation fee? How expensive? Do those fees change with a longer-term contract?

3 months if you do cancel

Are there any money back guarantees? What are the details?

look them up on website

4. Service Quality

Ask the CSR for information on service quality. Do they have good service? Where is the tower that will serve your home?

yes - yes

5. Voice Service

Ask the CSR if you will be able to get a telephone and a phone number with your service.

- ☒ Yes, they have voice service. *25.65 on hold price*
- ☐ No, they do not have voice service.

Ask the CSR if you can keep your current phone number.

- ☐ Yes, I can keep my phone number. *they will ok*
- ☐ No, I cannot keep my phone number.

Do not sign up for voice service. Tell the CSR, if they press, that you were just curious about how that worked.

6. Service Timing

Ask the CSR when they would be able to get you connected. Record what they tell you.

3 weeks

If they give you only a general answer, ask them how long it normally takes them to connect someone once service is ordered. Record what they tell you.

7. Call Conclusion

Thank the CSR for their time and tell them you want to think about it.

Call completed at (time): _____

8. Reporting Back Your Information

Call or email the following at Vantage Point Solutions to provide the information you have gathered:

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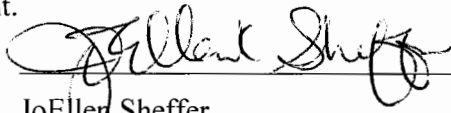
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of Rate-of-Return Study Areas 100 Percent)	
Overlapped by Unsubsidized Competitors)	

SWORN STATEMENT OF JOELLEN SHEFFER

I, JoEllen Sheffer, being of lawful age and duly sworn, state as follows:

1. My name is JoEllen Sheffer.
2. At 9:45 am on 08/29/17, I called Transworld Network, Corp. to inquire about getting service at 9771 N 300 E, Monon, IN 47959. I have attached my notes from my call with Transworld Customer Service Representative, Ron, and have labeled it "Attachment A."
3. I called the Transworld Customer Service Representative number 1-800-950-3015.
4. I spoke with Ron who informed me I have 2 residential service options:
 - 1 Mb up to 4 Mb for \$49.95
 - 1.5 Mb up to 6 Mb for \$79.95
5. The Customer Service Representative mentioned there is a business option of 10 Mb download speeds but the price is \$50.00 per Mb a month, which totals \$500.00 per month.
6. The Customer Service Representative also told me it would take 3 weeks for the service to be installed at this residence.
7. The call ended at 9:35 am.
8. This completes my Sworn Statement.



JoEllen Sheffer
Declarant



Service Request Instructions and Call Notes

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Your goal is to inquire about securing service without broadcasting to the competitor this is part of a test. Take good notes while you are on the phone. After the call is completed, Vantage Point Solutions will type up your notes, have you sign an affidavit and file them with regulators.

Date 8-29-17 Time 9:45 AM

1. Opening

Let the customer service representative (CSR) know ^{you} are interested in getting wireless Internet service. (They will probably ask for your name and address. Feel free to provide that information)

The CSR may indicate they **cannot** provide service in your area. If that is the case, complete this section:

☐ CSR indicated they **cannot** provide service in my area.

Reason given: _____

2. Identifying Options

Ask the CSR what Internet speed packages ^{do you} and prices ^{they} offer. (Record what he/she tells you.)

turbo	1 meg up to 4	49.95
extreme	1.5 - 6	2.05 79.95
	unlimited	

Is there a package (either residential or business) offering 10 Megabits per second (often referred to as "10 meg") or more?

If NO, thank them for their time and hang-up. Call completed at (time): _____

If YES, continue with the call.

business
plan
\$50 per
meg

10 Meg \$250?
router fee \$12.

3. Terms and Conditions

Ask the CSR for information on these items:

- Is there an installation fee? How much? Do those fees change with a longer-term contract?

1 year term is free

no contract \$99.99 residential

Do you have to purchase equipment? How expensive? Do those fees change with a longer-term contract?

No

Is there a cancellation fee? How expensive? Do those fees change with a longer-term contract?

Yes - last 3 months worth of service 1 year

No charge if no contract

Are there any money back guarantees? What are the details?

on web site they work with you

willpower.com

4. Service Quality

Ask the CSR for information on service quality. Do ^{you} have good service? Where is the tower that will serve ^{my} home?

tower
5 miles
away

One tower is 5 miles away there is
another tower 7 miles away from our address.

7 tower
miles

5. Voice Service

Ask the CSR if you will be able to get a telephone and a phone number with your service.

☒ Yes, they have voice service.

☐ No, they do not have voice service.

Ask the CSR if you can keep your current phone number.

☐ Yes, I can keep my phone number.

☐ No, I cannot keep my phone number.

Do not sign up for voice service. Tell the CSR, if they press, that you were just curious about how that worked.

6. Service Timing

Ask the CSR when they would be able to get you connected. (Record what they tell you.)

1-2 weeks IN about 3 weeks

(If they give you only a general answer) ask them how long it normally takes them to connect someone once service is ordered. Record what they tell you.

7. Call Conclusion

Thank the CSR for their time and tell them you want to think about it.

Call completed at (time): 9:56

8. Reporting Back Your Information

Call or email the following at Vantage Point Solutions to provide the information you have gathered:

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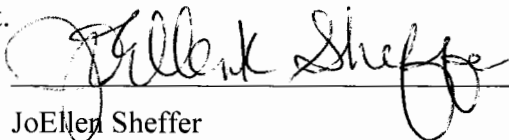
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SWORN STATEMENT OF JOELLEN SHEFFER

I, JoEllen Sheffer, being of lawful age and duly sworn, state as follows:

1. My name is JoEllen Sheffer.
2. At 1:10 pm on 08/31/17, I called Transworld Network, Corp. to inquire about getting service at 4250 N 300 E, Monticello, IN 47960. I have attached my notes from my call with Transworld Customer Service Representative, Rebecca, and have labeled it "Attachment A."
3. I called the Transworld Customer Service Representative number 1-800-950-3015.
4. I spoke with Rebecca who informed me I have 2 residential service options:
 - 1 Mb up to 4 Mb for \$49.95
 - 1.5 Mb up to 6 Mb for \$79.95
5. The Customer Service Representative mentioned there is a business option of 10 Mb download speeds but the price is \$50.00 per Mb a month, which totals \$500.00 per month. Also, they have a business class plan for \$250.00 per month.
6. The Customer Service Representative also told me it would take 3 to 4 weeks for the service to be installed at this residence.
7. The call ended at 1:25 pm.
8. This completes my Sworn Statement.


JoEllen Sheffer
Declarant



Service Request Instructions and Call Notes

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Your goal is to inquire about securing service without broadcasting to the competitor this is part of a test. Take good notes while you are on the phone. After the call is completed, Vantage Point Solutions will type up your notes, have you sign an affidavit and file them with regulators.

Date 8-31-17

Time 9:50 on hold waiting for 4 min
1:10pm

1. Opening

Rebecca
4250 N 300 E
Monticello IN 47960
Let the customer service representative (CSR) know you are interested in getting wireless Internet service. (They will probably ask for your name and address. Feel free to provide that information.)

The CSR may indicate they **cannot** provide service in your area. If that is the case, complete this section:

☐ CSR indicated they **cannot** provide service in my area.

Yes

Reason given: _____

2. Identifying Options

Sales dept. 1:14 waiting on avail. Rep 1:14
Ask the CSR what Internet speed packages and prices ^{do you} they offer. (Record what he/she tells you.)

turbo 1 meg bursts to up to 4 *4495*
7995
Extreme 1.5-16 (all unlimited)

They don't offer 10 Megabits to a residential acct but if you get the business class plan you can get 10 megs	Resident/dont Business class plan
\$250. It's priced out \$50 a meg	\$250 50 a meg \$512
but with the Business class plan you get it for \$250. as a residential person.	

Is there a package (either residential or business) offering 10 Megabits per second (often referred to as "10 meg") or more?

If NO, thank them for their time and hang-up. Call completed at (time): _____

If YES, continue with the call.

3. Terms and Conditions

Ask the CSR for information on these items:

- Is there an installation fee? How much? Do those fees change with a longer-term contract?

A year term is free
otherwise is \$99 installation fee

- Do you have to purchase equipment? How expensive? Do those fees change with a longer-term contract?

No Payment due at installation

- Is there a cancellation fee? How expensive? Do those fees change with a longer-term contract?

3 months worth of service fee

- Are there any money back guarantees? What are the details?

you can look on their website
wipower.com for terms & conditions

Deposit
Required
\$200

4. Service Quality

Ask the CSR for information on service quality. Do ^{you} ~~they~~ have good service? Where is the tower that will serve ^{my} ~~your~~ home?

Yes test for line of sight
test speeds when they do the installation

5. Voice Service

**25⁰⁰ for phone with the internet*
Ask the CSR if you ^I will be able to get a telephone and a phone number with ^{the} your service.

- ☒ Yes, they have voice service.
☐ No, they do not have voice service.

Ask the CSR if you can keep your current phone number.

- ☐ Yes, I can keep my phone number. *Not sure*
☐ No, I cannot keep my phone number.

Do not sign up for voice service. Tell the CSR, if they press, that you were just curious about how that worked.

6. Service Timing *When would you*

~~Ask the CSR when they would be able to get you~~ ^{me} connected. (Record what they tell you.)

3-4 weeks out suggests to call ASAP

(If they give you only a general answer,) ask them how long it normally takes ^{you} them to connect someone once service is ordered. (Record what they tell you.)

7. Call Conclusion *Thanks for your time!*

Thank the CSR for their time and tell them you want to think about it.

Call completed at (time): 1:25

8. Reporting Back Your Information

Call or email the following at Vantage Point Solutions to provide the information you have gathered:

Heath Koth, 605-995-1832, heath.koth@vantagepnt.com