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November 7, 2016

VIA ELECTRONIC FILING

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

Re: Challenge to Connect America Phase I (Round 2) Incremental Support Election of CenturyLink, WC Docket No. 10-90

Dear Ms. Dortch:

Comcast Corporation (“Comcast”) hereby challenges 338 census blocks that CenturyLink seeks funding to serve as part of the second round of Connect America Fund (“CAF”) Phase I.¹ Comcast already serves these census blocks, which are identified on Attachment A hereto. Comcast identified the 338 census blocks in question in its most recent FCC Form 477 filing.² For each of these census blocks, Comcast indicated that it provides Internet service at speeds exceeding 3 Mbps downstream and 768 kbps upstream as of June 2016.³ Moreover, a Comcast official certified to the accuracy of Comcast’s FCC Form 477 submission.

¹ On September 13, 2016, CenturyLink submitted a list of 9,703 additional census blocks that it intends to serve using Phase I incremental support. *See* Letter from Jeffrey S. Lanning, Vice President, Federal Regulatory Affairs, CenturyLink, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 10-90, at 1 (Sept. 13, 2016); *Wireline Competition Bureau Announces Deadline for Existing Providers to Notify CenturyLink that They Serve Census Blocks that CenturyLink Proposes to Serve with Connect America Phase I Incremental Support*, Public Notice, WC Docket No. 10-90, DA 16-1072 (rel. Sept. 23, 2016) (“CenturyLink Public Notice”).

² *See* FCC, *Fixed Broadband Deployment Data from FCC Form 477*, <https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477> (generally including any revisions made through August 29, 2016).

³ *See* CenturyLink Public Notice at 1 (indicating that existing providers must “currently offer Internet service at speeds of 3 Mbps downstream and 768 kbps upstream or higher in the newly identified census blocks”).

Since the National Broadband Map shows service data as of June 30, 2014,⁴ Comcast's more recent June 2016 Form 477 submission represents the most current, accurate deployment information on file with the Commission. The Wireline Competition Bureau ("Bureau") has made clear that in order for a potential funding recipient to obtain subsidy payments, the "location in question must be eligible at the time" the recipient completes the certifications required to receive support.⁵ Since CenturyLink now has knowledge of Comcast's FCC Form 477 filing, CenturyLink simply cannot certify that "to the best of [its] knowledge, the locations are, in fact, unserved by fixed Internet access" with the requisite speeds.⁶ To the contrary, Comcast has demonstrated through its FCC Form 477 submission that these areas are served by an unsubsidized competitor and therefore should not be eligible for CAF Phase I (Round 2) funding.

Notably, the entire purpose of requiring providers such as CenturyLink to report updates to planned Phase I deployments is to "better ensure that Phase I support is not spent in areas that already receive service through another provider."⁷ The Bureau must make certain that this aim is accomplished by ensuring that the FCC Form 477 data the Commission has gathered to assess the state of broadband deployment is considered and, as a result, that CenturyLink is *not* provided incremental support for these census blocks.

Respectfully submitted,

/s/ Beth Choroser

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⁴ See, e.g., FCC, *Broadband Availability Data from the National Broadband Map*, <https://www.fcc.gov/general/broadband-availability-data-national-broadband-map> (showing that National Broadband Map data is "as of June 30, 2014").

⁵ *Connect America Fund*, Order on Reconsideration, 28 FCC Rcd 10488, n.22 (2013) ("CAF Reconsideration Order").

⁶ 47 C.F.R. § 54.312(c)(5)(ii).

⁷ CAF Reconsideration Order ¶ 1; see also *id.* ¶ 6 ("This minor change strengthens our ongoing ability to oversee use of this public funding and is consistent with our commitment to accountability and oversight, ensuring that universal service funding is used as efficiently as possible.").

ATTACHMENT A*

List of Proposed Census Blocks Already Served by Comcast

1.	10670302001022	29.	120150305022039	57.	120690311031074
2.	10670302001039	30.	120210102102018	58.	120690311031115
3.	10670303003026	31.	120210104131025	59.	120690311031117
4.	10670305001016	32.	120210111021002	60.	120710012011059
5.	10690416001020	33.	120210112023008	61.	120710102042056
6.	10690419002004	34.	120210112023015	62.	120710401152042
7.	10970072023044	35.	120210112023109	63.	120710401262036
8.	80190147002248	36.	120210114003016	64.	120710401262037
9.	80190148001008	37.	120270103012006	65.	120710402031015
10.	80370007011002	38.	120430002002249	66.	120730025085005
11.	80370007031027	39.	120430002004036	67.	120730026041173
12.	80459519022021	40.	120499704005002	68.	120730026042001
13.	80590120343013	41.	120559609001006	69.	120730026061000
14.	80970001005000	42.	120559610003010	70.	120791101002035
15.	80970001005044	43.	120559610003111	71.	120791101002054
16.	80970001005063	44.	120559612004012	72.	120791103012004
17.	80970001005095	45.	120632107003016	73.	120791103021047
18.	80970004014000	46.	120632107003028	74.	120791103021055
19.	80970004021033	47.	120632108003025	75.	120791103022000
20.	80970004021054	48.	120632108003041	76.	120791103022017
21.	80970004021101	49.	120632110001055	77.	120791103022042
22.	80970005002154	50.	120690301054024	78.	120791104002015
23.	81170002005009	51.	120690301055000	79.	120830006051039
24.	120070003002040	52.	120690301055002	80.	120830006051050
25.	120150105012024	53.	120690302031080	81.	120830007012145
26.	120150105021006	54.	120690304092000	82.	120830007012206
27.	120150105022003	55.	120690309022012	83.	120830007022034
28.	120150305011046	56.	120690311031072	84.	120830007022040

* For ease of reference, a machine-readable version of Attachment A is also attached.

85.	120830007022064	116.	131790106001016	147.	340190113012054
86.	120830007022066	117.	181159658001016	148.	340190113021062
87.	120830007022071	118.	270190910003004	149.	340270459023004
88.	120830007022075	119.	270190910003040	150.	340350529041051
89.	120830008021000	120.	270370611072017	151.	340350537032012
90.	120830011031057	121.	271630704042011	152.	340410315001009
91.	120830011031063	122.	290370606002014	153.	340410315001021
92.	120830011031175	123.	280330707221013	154.	340410316013025
93.	120830011031179	124.	280330707221023	155.	350450001002052
94.	120830012041003	125.	280330708111000	156.	350450006082016
95.	120830012061040	126.	280330708301027	157.	350450006102000
96.	120830012061085	127.	280330708301037	158.	350450006112150
97.	120830012061087	128.	280330709001001	159.	410099710002003
98.	120830012061098	129.	280939502001004	160.	420010312021088
99.	120830027023000	130.	280939502002089	161.	420010316003068
100.	121050160031056	131.	280939502003006	162.	420010317001056
101.	121290101001095	132.	280939502003067	163.	420010317001086
102.	121290101002013	133.	280939502004002	164.	420099604002028
103.	121290101003018	134.	280939502004008	165.	420099606005039
104.	121290101003061	135.	280939502004016	166.	420099610003051
105.	121290102012038	136.	280939503005005	167.	420099611001058
106.	121290102013031	137.	280939503005014	168.	420099611004006
107.	130299203062066	138.	280939503005017	169.	420099611004021
108.	130299203063038	139.	280939503005019	170.	420130108001031
109.	130299203063063	140.	370339303002000	171.	420199101001008
110.	131790102052009	141.	370339303002003	172.	420199101001036
111.	131790104003004	142.	370339303004008	173.	420270101002022
112.	131790105011031	143.	340190102003015	174.	420270101004002
113.	131790105021060	144.	340190108012031	175.	420270107001002
114.	131790105021072	145.	340190110011035	176.	420270107001018
115.	131790106001000	146.	340190110012042	177.	420270107001027

178.	420270107002061	209.	470650112014000	240.	510350802002000
179.	420270107003000	210.	471570215202221	241.	510350803003056
180.	420350308001009	211.	471710801001001	242.	510350804001096
181.	420350308003000	212.	471710801001060	243.	510350806012029
182.	420410118031000	213.	471710802003084	244.	510650201011037
183.	420410118032172	214.	471790605021030	245.	510650201011067
184.	420410118032233	215.	471790616012012	246.	510650201011082
185.	420410119011004	216.	471790616012024	247.	510650201012045
186.	420410130002001	217.	471790616024011	248.	510650201012069
187.	420550105001054	218.	482012227002007	249.	510650201013000
188.	420550114001025	219.	482012507012095	250.	510650202003068
189.	420579601001015	220.	482012507012100	251.	510650202004006
190.	420579601003000	221.	482012507021024	252.	510650202004017
191.	420579601003006	222.	482012514021032	253.	510670209003133
192.	420579601003055	223.	483396926021000	254.	510770601011052
193.	420990304003002	224.	510030104021005	255.	510770601014031
194.	420990305023017	225.	510030104021020	256.	510770601023019
195.	421212015004001	226.	510030104022034	257.	510770602012019
196.	450130009031086	227.	510030109011010	258.	510770602022010
197.	450130011011012	228.	510030109011023	259.	510790301011084
198.	450130011012023	229.	510030109012000	260.	510790301011087
199.	450130011021004	230.	510030109012003	261.	510790301012029
200.	450499201003002	231.	510030109022000	262.	510839302011072
201.	450499202004051	232.	510030109031000	263.	510839302022095
202.	470190705002013	233.	510030109032004	264.	510890102001000
203.	470190713005024	234.	510030112011000	265.	510890104003032
204.	470190715002009	235.	510030112013021	266.	510890105001002
205.	470590901006017	236.	510030112021010	267.	510890109001091
206.	470590911002035	237.	510030113014066	268.	511390301003143
207.	470590911002092	238.	510310207001057	269.	511390303001010
208.	470590914002000	239.	510350801001075	270.	511390303001013

271.	511430110012068	302.	511870207001008	333.	530530730013025
272.	511430110021070	303.	511910107002012	334.	530670119001006
273.	511430111002006	304.	511910108001001	335.	530670120001032
274.	511579501002004	305.	511910108001006	336.	530670120001040
275.	511579501002022	306.	515200201003079	337.	550939605004007
276.	511579502002002	307.	516400701011001	338.	550939606002015
277.	511639301003006	308.	516400701011012		
278.	511639303001019	309.	516400701011027		
279.	511639303001043	310.	516400701016011		
280.	511639303002001	311.	516400701021009		
281.	511639303002032	312.	516400701021014		
282.	511639303005024	313.	516400701022013		
283.	511639304002045	314.	516900005001007		
284.	511639304003000	315.	516900005002003		
285.	511639304004002	316.	516900005002004		
286.	511730301001061	317.	530110404031020		
287.	511730302003023	318.	530150020014008		
288.	511730303012045	319.	530270005004012		
289.	511730303024000	320.	530270005004027		
290.	511730304002131	321.	530270005005037		
291.	511730305002028	322.	530270007001180		
292.	511730306002000	323.	530270008003009		
293.	511730306002039	324.	530270016002061		
294.	511730307011002	325.	530419701001025		
295.	511870201001036	326.	530499502001023		
296.	511870201001107	327.	530499502002060		
297.	511870201002005	328.	530499503002028		
298.	511870201002049	329.	530530724063000		
299.	511870201002056	330.	530530729051009		
300.	511870201003042	331.	530530729051070		
301.	511870206021042	332.	530530730013002		

CERTIFICATE OF SERVICE

I, Erica A. Bettenhausen, hereby certify that a true and correct copy of the foregoing Letter of Comcast Corporation was served on this 7th day of November, 2016, by electronic mail, to the following:

CenturyLink
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/s/ Erica A. Bettenhausen
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