

November 8, 2014

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Massillon Cable TV, Inc. Response to CenturyLink's Served-to-Unserved Challenges Under Connect America Fund Phase II; WC Docket No. 14-93; DA 14-942, 14-1397**

Ms. Dortch:

Massillon Cable TV, Inc. (MCTV), on behalf of Clear Picture, Inc. (a wholly owned subsidiary – FRN 000294437) hereby files this response to the served-to-unserved challenges filed by CenturyLink in Phase II of the Connect America Fund.

MCTV is filing two Form 505 rebuttal forms. The first, MCTV Response 505-1 certifies that MCTV fully serves 59 census blocks identified in served-to-unserved challenges by CenturyLink. I hereby certify that MCTV has deployed broadband and voice plant and is capable of delivering service in these 59 census blocks.

The second rebuttal form, MCTV Response 505-2, questions the propriety of CenturyLink's characterization of 11 additional census blocks as unserved. These 11 census blocks have no residential or commercial structures and no population. They are, rather, fields, highway berms, parking lots and the boulevard section of residential streets. It is simply inappropriate to characterize these areas as unserved because there simply is no one to serve in them.

MCTV's Form 505 challenges are supported by several forms of additional evidence. By this letter, I am providing the following factual statements:

- These rebuttals are MCTV's response to the served-to-unserved challenge filed by CenturyLink.
- I have direct knowledge of the facts set forth in this statement as the result of my responsibilities as MCTV's President. I review company information regarding subscribers, network facilities, revenue and other information including monitoring the Company's Form 477 filings, coordinating the development and filing of mapping information for the National Broadband Map and managing MCTV's voice traffic and interconnections with other carriers. I certify to the accuracy of this information, to the best of my knowledge.
- This statement supports two separate Form 505's filed by MCTV.

- The first, MCTV Response 505-1, identifies 59 challenged census blocks which MCTV serves. In these blocks MCTV is: 1) offering voice and broadband service; 2) has voice and broadband capable physical assets in the block; and, 3) has a current or former customer. I certify that all homes within each of these 59 census blocks is serviceable.
- The second, MCTV Response 505-2, identifies 11 challenged census blocks in which there are no residential or commercial structures and no population. It is inappropriate for CenturyLink to characterize these census blocks as “unserved” since there is no population to serve.
- Additional evidence supporting MCTV's challenge is attached to the filings.
  - In MCTV Response 505-1, this evidence in maps of those census blocks where MCTV has current or former customers. There is one map for each census block. The maps are generated on Google Earth. Each map identifies the location of each challenged census block. The approximate location of active or former customers is identified in each census block.
  - In MCTV Response 505-2, this evidence in maps showing that each census block has no structure and no population. There is one map for each census block. The maps are generated on Google Earth. It is clearly evident that there are no habitable structures in these census blocks.
- I certify that MCTV offers a variety of broadband service levels, including a level called “High Velocity,” which provides speeds of 20 mbps/1.5 mbps, with no data cap, at a price below the FCC benchmark rate. The attached advertisement provides the details of the service and pricing.
- I certify that MCTV offers voice service in all of these census blocks which includes unlimited local calls, up to 3,000 minutes of long distance calling and more than 2 dozen features at a price below the FCC benchmark rate. The attached advertisement provides the details of the services and pricing.
- MCTV offers high-speed Internet and voice services on a standalone or bundled basis.

This information establishes that the broadband and voice services offered in all of these blocks meet the requirements set forth under Commission rules. Specifically, that broadband service is provided at speeds of at least 4 Mbps downstream and 1 Mbps upstream at a price that is reasonably comparable to rates in urban areas. Similarly, MCTV's voice service is offered at a price that is reasonably comparable to, or below, rates in urban areas.

The evidence accompanying MCTV Response 505-1 demonstrates that the company has physical facilities, provides service to at least one current or former customer and that service is available to every home in each of the census blocks identified therein. As such, the Bureau should designate these blocks as served and decline to direct CAF support to such areas. MCTV Response 505-2 provides evidence that there is no population to serve within the census blocks identified therein and should decline CAF support to these areas.

Please contact me if you have any questions.

Sincerely,

Robert Gessner  
President

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# CERTIFICATE OF SERVICE

WC Docket No. 14-93; DA 14-942

I hereby affirm that I have undertaken a good faith effort to provide notice, via electronic mail, of Massillon Cable TV, Inc.'s CAF Phase II Rebuttal Challenge filing to the following persons on Monday, November 10, 2014.

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