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LNGS | LUKAS,
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November 10, 2014

VIA E-MAIL

Ryan Yates, Esq.
Telecommunications Access Policy Division
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Response to Connect America Fund Phase II Challenge
WC Docket No. 10-90 and WC Docket No. 14-93**

Dear Mr. Yates:

On behalf of TV Service, Inc. (“TVS”), please find the attached Form 505 and accompanying documents in reply to the Connect America Fund (“CAF”) Phase II challenge submitted by Windstream Corporation. TVS’s reply is submitted in accordance with the *CAF Phase II Challenge Public Notice*¹ and the *CAF Phase II Challenge Reply Public Notice*.²

TVS respectfully requests confidential treatment of certain information included in its filing, pursuant to the Commission’s *Third Protective Order*.³ Specifically, TVS has submitted two maps as Attachment F indicating which census blocks have current or former customers receiving TVS’s voice and/or broadband service. Because the map is an integrated whole not subject to redaction, it is being withheld from the public filing in its entirety.

¹ *Wireline Competition Bureau Provides Guidance Regarding Phase II Challenge Process*, WC Docket No. 10-90, Public Notice, DA 14-864 (rel. June 20, 2014) (“*CAF Phase II Challenge Public Notice*”).

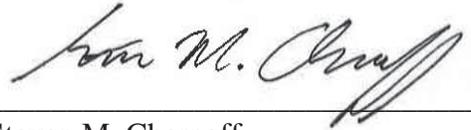
² *Replies Sought in Connect America Fund Phase II Challenge Process*, WC Docket Nos. 10-90 and 14-93, Public Notice, DA 14-1397 (rel. Sept. 26, 2014) (“*CAF Phase II Challenge Reply Public Notice*”).

³ *Connect America Fund et al., Third Protective Order*, 27 FCC Rcd 10276 (2012).

Ryan Yates, Esq.
November 10, 2014
Page 2 of 2

If any questions arise concerning the above-referenced enclosures, please contact me directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven M. Chernoff". The signature is written in a cursive style with a horizontal line underneath it.

Steven M. Chernoff

Attorney for:
TV Service, Inc.

Enclosures

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund Phase II Challenge Process)	WC Docket No. 14-93
)	
Replies Sought in Connect America Phase II Challenge Process)	DA 14-1397
)	

**REPLY OF TV SERVICE, INC. TO
CENSUS BLOCK CHALLENGE BY WINDSTREAM CORPORATION**

TV Service, Inc. (“TVS”), by counsel and pursuant to the *CAF Phase II Challenge Public Notice*¹ and the *CAF Phase II Challenge Reply Public Notice*,² hereby files this reply to the census block challenge filed by Windstream Corporation (“Windstream”) in the above-captioned proceeding.

I. BACKGROUND AND INTRODUCTION

TVS is a locally owned and operated cable company providing voice telephone, Internet access, and cable television service in a service area comprising all or part of seven counties in eastern Kentucky. TVS is not an eligible telecommunications carrier and does not receive support from the high-cost Universal Service Fund program.

¹ *Wireline Competition Bureau Provides Guidance Regarding Phase II Challenge Process*, WC Docket No. 10-90, Public Notice, DA 14-864 (rel. June 20, 2014) (“*CAF Phase II Challenge Public Notice*”).

² *Replies Sought in Connect America Fund Phase II Challenge Process*, WC Docket Nos. 10-90 and 14-93, Public Notice, DA 14-1397 (rel. Sept. 26, 2014) (“*CAF Phase II Challenge Reply Public Notice*”).

In the *CAF Phase II Challenge Reply Public Notice*,³ the Commission invited parties to submit replies to challenges filed in response to the list of eligible census blocks initially deemed eligible for Connect America Fund (“CAF”) Phase II support. Windstream filed a broad challenge claiming over 9,000 census blocks as “unserved” in an attempt to reclassify the census blocks as eligible for purposes of CAF Phase II support. The challenge included 86 census blocks identified with TVS.

This reply is being submitted to provide the Commission with evidence – in the form of company advertising, employee declarations, customer location information, and broadband speed test results – that TVS currently offers voice and broadband service in each of the 86 census blocks identified with TVS in Windstream’s challenge. Because TVS is an unsubsidized competitor and offers voice and broadband service in all of the areas in question, all of the identified census blocks should continue to be classified as ineligible for CAF Phase II funding.

II. TVS OFFERS VOICE AND BROADBAND SERVICE IN ALL OF THE CENSUS BLOCKS WITH WHICH IT IS IDENTIFIED IN WINDSTREAM’S CHALLENGE

When the Commission established eligible areas for purposes of CAF Phase II, those initial determinations were based on whether a census block was shown as unserved by an unsubsidized competitor according to the National Broadband Map. The Commission invited interested parties to challenge the listings by submitting evidence that a census block on the list is in fact served (“unserved to served”) or that a census block omitted from the list is in fact unserved (“served to unserved”).

³ *Replies Sought in Connect America Fund Phase II Challenge Process*, WC Docket Nos. 10-90 and 14-93, Public Notice, DA 14-1397 (rel. Sept. 26, 2014) (“*CAF Phase II Challenge Reply Public Notice*”).

Windstream filed a “served to unserved” challenge alleging that 9,605 census blocks shown as served by unsubsidized competitors on the National Broadband Map are actually unserved. According to the declaration included with its challenge, Windstream conducted an analysis yielding a finding that no numbers had been ported within the subject census blocks over a 12-month period. In addition, the declaration stated that Windstream engaged a consulting firm to perform an analysis of IP traffic which allegedly showed an absence of IP traffic within the subject census blocks.

TVS currently offers voice and broadband service meeting the Commission’s criteria in all 86 census blocks with which it is identified in Windstream’s challenge. Along with Form 505 (Attachment A), TVS provides as evidence the declarations of David Thacker, the Technical Operations Manager for TVS (Attachment B) (“Thacker Declaration”), and LD Calhoun, System Administrator for TVS (Attachment C) (“Calhoun Declaration”), consisting of factual assertions supported by documentation provided in Attachments D through H.

A. Windstream’s IP Usage Study Does Not Demonstrate a Lack of Broadband Service in the Census Blocks in Question.

The IP usage study described in Windstream’s challenge measured IP activity and attempted to source the activity (or lack thereof) by identifying IP addresses to specific geographic areas. As discussed in the Calhoun Declaration, this methodology rested on faulty assumptions and failed to demonstrate a lack of Internet usage in the areas in question.

In his declaration, Mr. Calhoun describes the architecture of TVS’s broadband network. As described by Mr. Calhoun, TVS employs four 1-Gigabit access circuits which all terminate to the same core Cisco 7613 router located in Hindman, KY. The company has local transport between its core router and all of its outlying CMTS routers, so it does not have access circuits that terminate in areas other than the core. As a result, the company’s IP addresses are all tied to

the same Autonomous System (AS) number.⁴ Mr. Calhoun states that all of TVS's ARIN allocations show the same location in lookups – even though the IP pools are used to serve the large variety of locations serviced by TVS. This means that a study that measures usage by a particular IP address will not reflect the location of individual end user customers. Accordingly, Windstream's IP usage study does not demonstrate a lack of Internet usage in the 86 census blocks associated with TVS.

In addition, Windstream's analysis fails to address the Commission's requirement that a census block have current *or former* customers in order to be considered "served." Even if Windstream's analysis conclusively demonstrated a lack of IP traffic in a certain census block during the period under study, such a result is of no evidentiary value whatsoever for purposes of demonstrating that there have been no customers there in the past.

B. Advertising and Customer Bills.

TVS currently advertises the availability of voice and broadband service offerings, both on a stand-alone and bundled basis, throughout its service area. TVS provides as Attachment D copies of web-based advertising which details the pricing and features of its voice and broadband service offerings. As indicated in the advertisements, TVS offers voice service as well as several Internet access plans that all offer unlimited local usage. The voice telephone service offers unlimited local usage and 500 long distance minutes for a monthly price of \$44.99, which is below the reasonable voice comparability benchmark of \$46.96.⁵ One of the Internet access plans provides speeds of 10 MB downstream and 1 MB upstream, for a price of \$84.95. This

⁴ The AS number is a unique identifier assigned by the American Registry of Internet Numbers (ARIN) used for the purpose of identifying all the resources such as IP space and networks that are assigned to TVS.

⁵ *Wireline Competition Bureau Announces Results of Urban Rate Survey for Voice Services; Seeks Comment on Petition for Extension of Time to Comply with New Rate Floor*, WC Docket No. 10-90, Public Notice, DA 14-384 (rel. March 20, 2014).

offering exceeds the minimum speed threshold of 4 MB downstream and 1 MB upstream, and is priced below the broadband rate comparability threshold of \$85.45.⁶ Accordingly, TVS currently has voice and broadband service offerings with pricing that is reasonably comparable to the pricing for similar offerings in urban areas.

As evidence that TVS currently provides voice and broadband service, TVS provides as Attachment E examples of customer bills with identifying information redacted out. The services, described in the lower right-hand portion of each bill, include voice telephony as well as various Internet access plans.

C. Customer Locations.

To demonstrate that TVS currently offers service to each of the census blocks listed in Windstream's challenge, TVS mapped the locations of current and former customers who receive or received voice and/or broadband service from TVS, and placed them on a map of the census blocks in question. The resulting maps, provided as Attachment F,⁷ shows that TVS has current or former customers in 69 of the challenged census blocks.

With respect to the remaining 17 census blocks, in a separate pleading as Attachment G TVS requests a waiver of the evidentiary requirement that an area must have current or former voice and/or broadband customers in order to withstand a CAF Phase II challenge. In 12 of those census blocks, TVS has current or former subscribers to its *cable television* service. While the Commission did not list cable television alongside voice and broadband service in specifying the types of current or former customers a census block have, TVS uses the same physical plan to provide cable television as it does voice and broadband service. As discussed in the Thacker

⁶ *Connect America Fund*, WC Docket No. 10-90, Report and Order, DA 14-1569 (WCB rel. Oct. 29, 2014).

⁷ Attachment F is submitted confidentially pursuant to the Third Protective Order in WC Docket No. 10-90. See attached Disclosure Statement.

Declaration, the physical infrastructure is already in place. Therefore, provisioning voice or broadband to these customers would be a simple matter of installing customer premise equipment and activating service. These 12 census blocks should be considered served because customers have already been connected to the required facilities.

The remaining five census blocks should be considered served because they are very rural with few households. Although TVS is capable of providing service upon reasonable request within a 10-day period, no customers have subscribed to TVS voice or broadband service precisely because these census blocks are so lightly populated. Accordingly, TVS has requested a waiver permitting these census blocks to be treated as served for purposes of CAF Phase II.

D. Data Throughput Tests.

TVS also conducted a series of data throughput tests, using an online tool called Ookla Speed Test, to measure the data speeds of TVS's Internet access service in each of the census blocks. A spreadsheet matching the speed test results to individual census blocks is provided as Attachment H. As discussed in the Thacker Declaration, the speed test results demonstrate that TVS has broadband-capable facilities in all except two of the challenged census blocks. In one of the census blocks, TVS formerly had a broadband customer, meaning the census block is considered served. The other census block is among those for which a waiver has been requested due to sparse population, as discussed in Section II.C, *supra*.

III. CONCLUSION

Through the declarations and exhibits provided in its reply, TVS has demonstrated that it currently offers voice and broadband service in all 86 census blocks with which it is identified in Windstream's challenge. The company has provided employee declarations containing factual assertions, supported by documentation, in accordance with the evidentiary standards set forth in

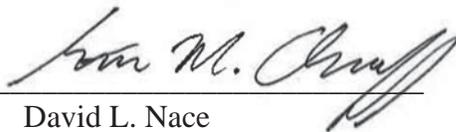
the *CAF Phase II Challenge Public Notice* and the *CAF Phase II Challenge Reply Public Notice*. The factual assertions in the employee declarations, along with the supporting documentation, all demonstrate that the company offers voice and broadband service that meets the Commission's service requirements for CAF Phase II. The service offerings have prices that are reasonably comparable to those for voice and broadband services in urban areas. The company has current or former voice and/or broadband customers in 69 of the 86 census blocks. Of the remaining 17 census blocks, 12 already have been hooked up to cable television service via the same facilities used in the provision of voice and broadband service; five are extremely rural and thus deserving of a waiver to treat them as served. Finally, the speed tests conducted by the company show that TVS has broadband-capable facilities present in virtually all of the listed census blocks.

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Because TVS offers voice and broadband service in each of the census blocks, all 86 census blocks should remain classified as ineligible for CAF Phase II funding.

Respectfully submitted,

TV SERVICE, INC.

By: 

David L. Nace

Steven M. Chernoff

LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 Greensboro Drive, Suite 1200

McLean, VA 22102

(703) 584-8669

Its Attorneys

November 10, 2014

List of Attachments

- Attachment A: Form 505
- Attachment B: Declaration of David Thacker
- Attachment C: Declaration of LD Calhoun
- Attachment D: Web-based Advertising
- Attachment E: Samples of Customer Bills
- Attachment F: Map of Customer Locations
- Attachment G: Request for Waiver
- Attachment H: Summary of Speed Test Results

ATTACHMENT A

Connect America Phase II Challenge Process Form
OMB Control Number 3060-1188
FCC Form 505

Filing Entity: TV Service, Inc.

FRN (if applicable): 1789064

Name of Person Filling Out Form: David Thacker

Mailing Address of Person Filling Out Form: P.O. Box 1410, Hindman, KY 41822

Email Address of Person Filling Out Form: d.thacker@tgtel.com

Phone Number of Person Filling Out Form: (606) 438-9533

Name of Person Certifying Data within Form: William K. Grigsby

Mailing Address of Person Certifying Data within Form: P.O. Box 1410, Hindman, KY 41822

Email Address of Person Certifying Data within Form: b.grigsby@tgtel.com

Phone Number of Person Certifying Data within Form: (606) 785-2227

Case, Block, & Digit EFS Code	State	Name of Entity Making Initial Challenge	FRN or Entity Making Challenge (if provided)	Insert X if Speed Criteria is at Issue	Insert X if Usage Allowance Criteria is at Issue	Insert X if Latency Criteria is at Issue	Insert X if Price Criteria is at Issue	Insert X if Voice Criteria is at Issue	Type of Supporting Evidence	Additional Comments	OMB Control Number: 3060-1185
211395605004049 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605005042 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605006001 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605002002 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605006013 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605007016 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605007018 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605007034 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211395605007038 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705002042 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.	Subject of request for waiver.	
211939705001000 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705001007 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705001010 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705001024 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705001026 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705001032 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705001036 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.	Subject of request for waiver; block has current/former cable television customers.	
211939705001039 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705002020 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705002025 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705002042 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705003013 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.	Subject of request for waiver; block has current/former cable television customers.	
211939705003033 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705003035 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705003038 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705003039 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705003044 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705004061 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.	Subject of request for waiver; block has current/former cable television customers.	
211939705004067 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		
211939705004095 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.	Subject of request for waiver; block has current/former cable television customers.	
211939705004096 KY	Windstream		0014400220	X	X	X	X	X	Customer location maps, customer bills, advertising, speed test data, employee declarations.		

All Filers Must Fill Out

Accuracy and Due Diligence Certification

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials:

WB
Date: *11/10/2014*

Notice of Challenge Certification

(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)

Service of Notice Successful

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials:

Date:

Service of Notice Unsuccessful

By initialing below, I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties that Could Not Be Served:

Certifier's Initials:

Date:

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

ATTACHMENT B

**Declaration of David Thacker
Technical Operations Manager
TV Service, Inc.**

1. My name is David Thacker, and I am the Technical Operations Manager of TV Service, Inc. (TVS). I am responsible for managing the company's voice and broadband network, including all aspects of network design and deployment.
2. I am making this declaration for the purpose of responding to the Connect America Fund Phase II challenge in which Windstream Corporation claimed that TVS does not provide voice or broadband service in certain census blocks.
3. I have reviewed Windstream Corporation's CAF Phase II challenge. Contrary to Windstream's claims, TVS currently offers both voice telephone service and broadband service exceeding 4 Mbps downstream and 1 Mbps upstream, with unlimited usage and with a latency of 100 ms or less, in each of the challenged census blocks.
4. Throughout its network, TVS currently offers voice telephone service as well as broadband Internet access service. Our voice and Internet offerings are detailed in the web page printouts provided as Attachment D. TVS offers digital voice service, including unlimited local calling and 500 long distance minutes, at a (non-promotional) price of \$44.99 per month. This is below the FCC's reasonable comparability benchmark of \$46.96 for voice service. Customers may choose from several broadband service packages that offer a variety of upload and download speeds. These packages include a plan with speeds of 10 Mbps downstream and 1 Mbps upstream, with unlimited data, priced at \$84.95 (also non-promotional). This plan is below the FCC's reasonable comparability benchmark of \$85.45. Therefore, customers throughout our network area receive

voice and broadband service meeting the FCC's criteria for purposes of CAF Phase II. We also provide as Attachment E several customer bills, with identifying information redacted, demonstrating that we are currently providing voice and broadband service.

5. As evidence of our voice and broadband service to the census blocks in question, we provide as Attachment F two maps, for Perry County and Letcher County, respectively, showing the challenged census blocks color-coded to indicate which ones have, or have had, TVS voice and/or broadband customers. Census blocks shaded in red are those in which we have, or have had, at least one voice or broadband customer. Blue shading indicates no current or former voice and/or broadband customers. In preparing the map, we used a county 911 map to locate the specific customer addresses. We have assembled these customers' bills, complete with address information, demonstrating that they received or currently receive voice and/or broadband service from TVS. Out of an abundance of caution in light of customer privacy requirements, we are not including copies of the bills with our response.
6. The maps provided as Attachment F show that we have, or had, at least one voice and/or broadband customer in 69 of the challenged census blocks. In 17 of the listed census blocks, we do not have current or former voice or broadband customers. However, 12 of those census blocks now have, or have had, TVS *cable television* customers. Cable television service is provisioned using the same physical network infrastructure used in the provision of voice and broadband service. Therefore, provisioning voice and/or broadband service to these customers would be a simple matter of installing customer premise equipment and activating service. The challenged census blocks with current or former cable television customers are listed below:

211939705001039
211939705003013
211939705004067
211939705004096

211939707002000
211939708001002
211939709001001
211939710002029
211939710002036
211939710002054
211939710003013
211939710004022

7. With regard to the remaining five census blocks, the reason for the lack of customers is that these census blocks are very rural with very few homes. According to 2010 U.S. Census data, four of these census blocks have fewer than 10 households:

211339506007034	8 households
211939709001039	4 households
211939710002013	1 household
211939710003009	2 households

8. The fifth census block (211939709001075) has 21 households but is very sparsely populated with only 4.4 households per square mile. Although TVS has not had customers in those census blocks to date, TVS has facilities in all of the census blocks and can provide voice service within 10 days of a request.
9. As further evidence that service meeting the Commission's standards is readily available, we conducted data throughput tests, using an online tool called Ookla Speedtest, which measured the upload and download speeds available at our nodes in each of the challenged census blocks. To conduct these measurements, our engineers connected modems to a "tap" on our coaxial cable line, and then used a mobile phone to connect wirelessly to the modem as a customer would do in his or her own home. We then recorded the longitude and latitude coordinates for each test and matched them to the corresponding census block. The speed tests demonstrate conclusively that TVS currently has broadband-capable network facilities in all except two of the census blocks: 211339506007034 and 211939704002042. While those two census blocks do not

contain actual network facilities, they are just beyond the reach of our network and we could easily provide voice and/or broadband service in those areas within 10 days. In fact, census block number 211939704002042 formerly had a broadband customer. (As discussed above, census block number 211339506007034 is among the census blocks for which a waiver of the customer requirement is requested due to very low population density.) In Attachment H, we summarize the results of the speed test by indicating the download and upload speeds measured on TVS's network in each of the tested census blocks.

10. I have read the foregoing Reply to Census Block Challenge, including the Request for Limited Waiver and other attachments, and they are true and correct to the best of my knowledge, information and belief.

I declare, under penalty of perjury, that the information contained in this declaration, is true and correct to the best of my knowledge, information and belief.



David Thacker
Technical Operations Manager
TV Service, Inc.

Executed: November 10, 2014

ATTACHMENT C

**Declaration of LD Calhoun
System Administrator
TV Service, Inc.**

1. My name is LD Calhoun and I am System Administrator for TV Service, Inc. (TVS). My responsibilities include all aspects of Network and Systems administration, including such items as routers, CMTS routers, and switches.
2. I am making this declaration for the purpose of responding to the Connect America Fund Phase II challenge in which Windstream Corporation claimed that TVS does not provide voice or broadband service in certain census blocks. Specifically, my declaration addresses Windstream's study purporting to show that there was "no evidence of IP traffic specifically related to the competitor(s) that is/are listed as serving the [census block.]"
3. In providing Internet access service to its customers, TVS employs four 1-Gigabit access circuits which all terminate to the same core Cisco 7613 router located in Hindman, KY. We have local transport between our core router and all our outlying CMTS routers, so we do not have access circuits that terminate in areas other than the core.
4. All of our IP addresses are tied to the same Autonomous System (AS) number. The AS number is a unique identifier assigned to us by the American Registry of Internet Numbers (ARIN) used for the purpose of identifying all the resources such as IP space and networks that are assigned to us.

5. Because our access circuits all terminate in the core, and all of our IP addresses are tied to the same AS number, all of our ARIN allocations show the same location in lookups – even though the IP pools are used to serve the large variety of locations we service.
6. I have reviewed Windstream’s CAF Phase II challenge. Windstream’s IP traffic analysis did not take into account the fact that because all our circuits terminate to the same core router, they will be tied to our AS number/account in all ARIN lookups and that will all show the same physical address where our core router is located. Even though the IP space is broken up and used in different locations, it all leaves our network through the core router and will always show that location according to ARIN’s guidelines.

Therefore, Windstream’s analysis did not succeed in demonstrating a lack of Internet service in the listed census blocks.
7. I declare, under penalty of perjury, that the information contained in this declaration is true and correct to the best of my knowledge, information and belief.



LD Calhoun
System Administrator
TV Service, Inc.

Executed: November 6, 2014

ATTACHMENT D



Offering the best in Digital Cable Television,
High Speed Internet, and Digital Phone Service

"Since 1966"

Television

Internet

Digital Voice

Advertising & Production

Support

[Packages](#)

[Bundles](#)

TVS Cable Digital Voice Residential Service

Available to TVS CableNet internet customers in Letcher, Perry & Leslie County

Digital Voice Phone Service

\$44.99 per month

We also require you to read and accept the terms of our [Service Agreement](#) before accepting service. Please read over the service agreement and ask any questions you may have before signing up for our service. Click [HERE](#) or the link above to view the Service Agreement.

Digital Voice Service includes:

- Unlimited Local Phone Service
- 500 Long Distance Minutes
- Area Calling (606 & 859 Area Codes)

Includes the following Calling Features

- Caller ID
- Call Waiting
- Call Waiting ID
- Call Block
- Call Forwarding (All)
- Call Forwarding (Busy)
- Call Forwarding (No Answer)
- Call Forwarding (Out Of Service)
- Selective Call Forwarding
- Voice Mail (optional)

Long Distance Overage Charge

\$0.10 per minute

The long distance overage charge on all packages is 10 cents per minute.

Equipment Requirements

To use our VOIP phone service you MUST have a MTA (Multimedia Terminal Adapter) that is provided by TVS Cable. We offer both a standard MTA (non-wireless) and Wireless MTA.

- Standard MTA - \$7.50 per month lease
- Wireless MTA - \$12.00 per month lease

In order to ensure compatibility with our service, the device must be leased from us, and is not available for purchase.

VOIP Installation Fee

There is a one time on-site installation fee of \$35.00 for all VOIP installations, which covers installing the MTA and connecting it to existing phone wiring at the residence.

NOTE: Applicable taxes and installation charges may apply in addition to pricing shown.

Notice: We make every effort possible to provide the correct information on this page. However there may instances where the changes cannot be made to this site as soon as the price changes go into effect. We reserve the right to modify or delete any package and plan without giving notice. The information and pricing listed here is subject to change at any given time, and we have no liability to offer these plans or rates posted on this site. Please contact our office for any additional information and package/pricing changes.

Email TVS Cable
tvs@tvscable.com

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(606) 633-0778 : (606) 281-1000 : (606) 946-2600

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Offering the best in Digital Cable Television,
High Speed Internet, and Digital Phone Service

"Since 1966"

Television	Internet	Digital Voice	Advertising & Production	Support
------------	----------	---------------	--------------------------	---------



Residential Packages

Package	CableNet	Quick CableNet	Extreme CableNet	Ultra CableNet	Elite CableNet
Maximum Download Speed*	768 k	1.5 Meg	3.0 Meg	6.0 Meg	10.0 Meg
Maximum Upload Speed*	256 k	384 k	384 k	512 k	1.0 Meg
Email Addresses Included	2	2	2	2	2
Monthly Cost**	\$ 29.95	\$ 34.95	\$ 39.95	\$ 49.95	\$ 84.95

[Packages](#)

[Coverage Area](#)

[Requirements](#)

[Webmail](#)

[CableNet Support](#)

[Email Support](#)

[Webmail Support](#)

[Internet Service Policy](#)

[Service Agreement](#)

* **Note:** The speeds for the packages are the maximum speeds possible with that particular package. Your speed can vary depending upon conditions outside our network that may cause a slower speed. We make very effort possible to provide the highest possible speed with your package, but we cannot guarantee you will constantly run at the maximum speed of your package.

** **NOTE:** Modem Fees, applicable taxes, and installation charges may apply in addition to pricing shown.

We also require you to read and accept the terms of our [Service Agreement](#) before accepting service. Please read over the service agreement and ask any questions you may have before signing up for our service. Click [HERE](#) or the link above to view the Service Agreement.

Business Packages

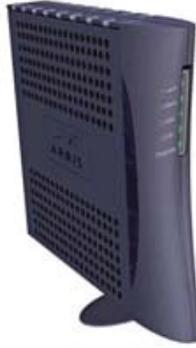
Package	Business CableNet	Ultra Business CableNet	Elite Business CableNet
Maximum Download Speed*	3.0 Meg	6.0 Meg	10.0 Meg
Maximum Upload Speed*	512 k	1.0 Meg	1.0 Meg
Email Addresses Included	3	3	3
Monthly Cost**	\$ 49.95	\$ 69.95	\$ 99.95

* **Note:** The speeds for the packages are the maximum speeds possible with that particular package. Your speed can vary depending upon conditions outside our network that may cause a slower speed. We make very effort possible to provide the highest possible speed with your package, but we cannot guarantee you will constantly run at the maximum speed of your package.

** **NOTE:** Modem Fees, applicable taxes, and installation charges may apply in addition to pricing shown.

We also require you to read and accept the terms of our [Service Agreement](#) before accepting service. Please read over the service agreement and ask any questions you may have before signing up for our service. Click [HERE](#) or the link above to view the CableNet Service Agreement.

Modem Information



You have the option to purchase a modem from us, purchase one from another retailer, or rent one from us.

We offer the Arris Touchstone CM550 Cable Modems for purchase. We currently sell this modem for **\$60.00**, plus tax.

If you choose to rent a modem from us, the modem rental fee will be **\$5.00 per month**.

Please note: We cannot guarantee modem compatibility with our system for any modem not rented or purchased from us, and hold no liability for any issues with such modems that are not compatible with our service.

Notice: We make every effort possible to provide the correct information on this page. However there may instances where the changes cannot be made to this site as soon as the price changes go into effect. We reserve the right to modify or delete any package and plan without giving notice. The information and pricing listed here is subject to change at any given time, and we have no liability to offer these plans or rates posted on this site. Please contact our office for any additional information and package/pricing changes.

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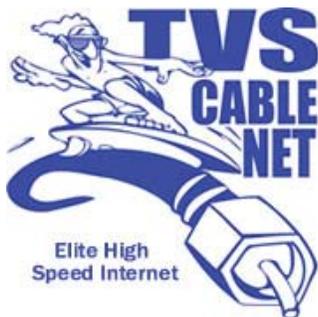
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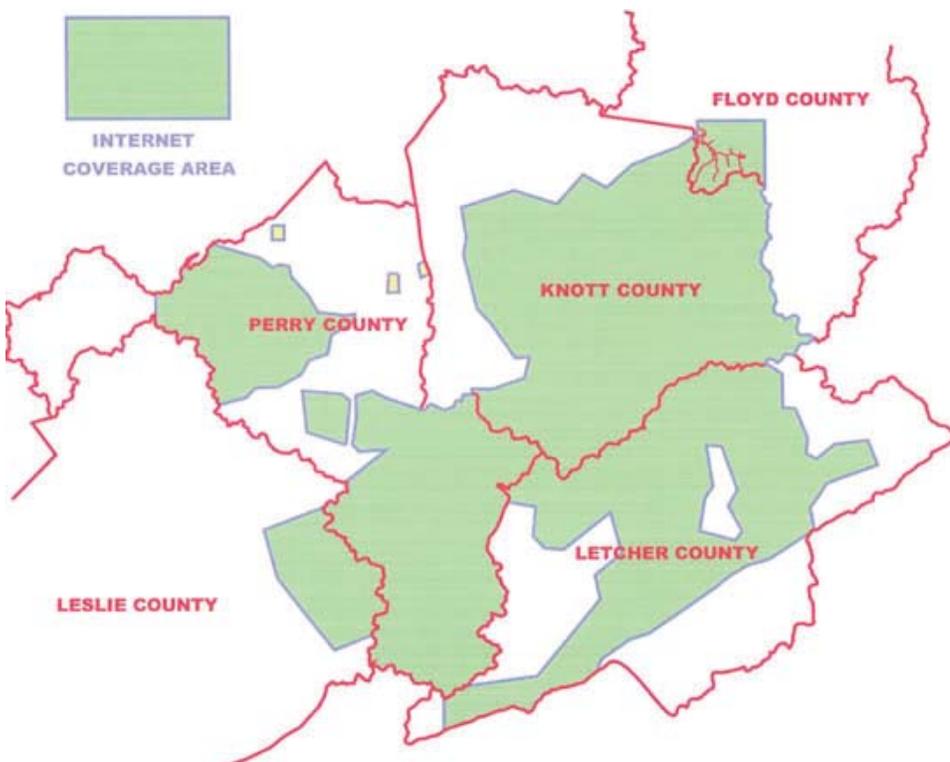
Offering the best in Digital Cable Television,
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Television	Internet	Digital Voice	Advertising & Production	Support
------------	----------	---------------	--------------------------	---------



The map below shows the areas that we currently offer internet service in. Our CableNet service is available in the areas shaded Yellow in the map. New areas will be added as soon as they become available. If you have any questions about your area, please call our office for more information.



[Packages](#)

[Coverage Area](#)

[Requirements](#)

[Webmail](#)

[CableNet Support](#)

[Email Support](#)

[Webmail Support](#)

[Internet Service Policy](#)

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****It is possible that some extreme outlying areas within some specified areas are not capable of being served at this time. Please call us for further information on availability specifics****

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Offering the best in Digital Cable Television,
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"Since 1966"

Television

Internet

Digital Voice

Advertising & Production

Support



To be eligible for CableNet Internet service, your computer must meet the following hardware requirements listed below. You will find the Recommended Requirements, as well as the Minimum Requirements.

Please Note: If your computer only meets the minimum requirements, the service may "appear" slower than it really is. Slower computer systems cannot process the data it is receiving as fast as it is coming into the computer. This will make your internet speed seem to be slow, when that is not actually the case. All speeds are checked at the cable modem, and we cannot guarantee any speed past that point of connection.

We also require you to read and accept the terms of our [Service Agreement](#) before accepting service. Please read over the service agreement and ask any questions you may have before signing up for our service. Click [HERE](#) or the link above to view the Service Agreement.

[Packages](#)

[Coverage Area](#)

[Requirements](#)

[Webmail](#)

[CableNet Support](#)

[Email Support](#)

[Webmail Support](#)

[Internet Service Policy](#)

[Service Agreement](#)

Recommended Computer Requirements

Processor	Intel Core i5® (or Compatible) Processor
Memory	2 GB RAM
Operating System	Microsoft Windows 7 Home Premium or Professional®
Network Interface	Ethernet Port

Minimum Computer Requirements

Processor	2.0 GHz Pentium® (or Compatible) Processor
Memory	512 MB RAM
Operating System	Microsoft Windows XP Home or Professional Service Pack 3®
Network Interface	Ethernet Port

Cable Modem Requirements

You must have a cable modem for use with our service. You can rent or purchase a modem from us, or you can purchase your own modem from another retailer. If you purchase a modem from a retailer other than us, we must have the HFC MAC ID of the modem in order for it to lock on to our server. You can find this number on either a sticker on the modem itself or the modem packaging. Please have this number handy when you call to schedule your appointment.

We rent and sell the Arris Touchstone CM550 Cable Modem as our preferred modem for use with our service.



Wondering what the lights on the modem mean? They can help you identify problems with your service, and can help you better identify the status of your service should you have any issues with your service. Refer to the Image and description below to help you understand the modems lights and states.

For a detailed explanation of the lights and what they mean, visit our [CableNet Support Page](#) for more information.

Notes on Other Systems and Hardware

Other Operating Systems:

We cannot directly support any Operating System other than Microsoft Windows 7® (any edition), Windows Vista® (any edition) with Service Pack 1 or Service Pack 2, Windows XP Home or Professional with Service Pack 3®. We can no longer directly support Microsoft Windows 98, Windows ME, Windows 2000, Windows XP (any edition) with a Service Pack older than SP2, or Windows Vista (any edition) without a Service Pack due to the fact that Microsoft has quit supporting those operating systems and are no longer releasing Critical Windows Update Patches for those operating systems. We can only offer the same limited support we offer for the Operating Systems listed below. You can find more information about Microsoft's decision to stop support on these operating systems here:

<http://www.microsoft.com/windows/support/endofsupport.mspx>

We are also limited in the support we can provide Macintosh OS X® and all versions of Linux operating systems. We CAN provide you with the necessary network settings, but we CANNOT be responsible for making any of these operating systems work correctly.

Connecting Multiple Computers in the Same Household

We have no restrictions on connecting multiple computers, gaming consoles, or any other internet capable devices, as long as they all reside within the same household or business location. You will have to have a router to connect multiple devices. We do NOT provide routers, but they are readily available at most retail stores. We take NO responsibility in the setup, maintenance, and usage of any wired or wireless network. It is solely the customers responsibility to manage any routers they use.

If you have any questions about setting up a home network, please call our office and we can offer you advice as to what brands and types of equipment we recommend you purchase. We have the experience needed to help you select the best equipment to buy for your home network.

PLEASE NOTE: Although the cable modem has an Ethernet AND USB port on them, using both at the same time will damage circuitry inside the modem cause the modem to become defective. If you lease or purchase the modem from us and you have both cables connected to the modem and the modem stops working, you WILL be help liable for the cost of that modem, and we are under no obligation to replace that modem. We are able to run a line test to the modem and see if both cables are connected, so we can trace users who are using the modems incorrectly. If you wish to connect more than one device to the cable modem, you MUST use the Ethernet connection and provide your own router for such purposes.

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ATTACHMENT E



Great Lakes Data

PO Box 1410
Hindman, KY 41822

606-439-3167

Bills are due by the 5th of each month. A late fee of \$5.00 will be added after this date. Please remit payment with bill stub.

Account Number	Due Date
	Nov 5th

Account Summary

Billing Date	Payments through:
VIPER KY 41774-8836	Previous balance
	Payments
	After Payments

Billing Questions Please Call
606-439-3167

Current Month Activity

Date	Description of Service	Amount
11/1/2014	6MEG RES/NOCABL	11/01..11/30 \$52.45

For Closed Caption concerns: Contact Kenny Salmons, Ph:(606)785-3450 ext. 7105, Fax:(606) 785-3110, Email:kenny@tvscable.com, Mail: TVS Cable, ATTN: Kenny Salmons - Assistant Manager, PO Box 1410, Hindman, KY 41822

Please detach at the perforation, and enclose this portion with your Payment. Thank you!

Service Address:

VIPER KY 41774-8836

PO Box 1410
Hindman, KY 41822

VIPER , KY 41774

Due Date	Account No.	Previous Bal.	Payments	Current Charges	Amount Due	Amt Enclosed
Nov 5th						

Please indicate the amount enclosed, do not send cash!
Please make check or money order payable to:

TV Service, Inc.
P.O. Box 1410
Hindman, KY 41822





Great Lakes Data

PO Box 1410
Hindman, KY 41822

Account Number	Due Date
010-005398	Nov 5th

Account Summary

606-439-3167

Bills are due by the 5th of each month. A late fee of \$5.00 will be added after this date. Please remit payment with bill stub.

Billing Date	Payments through: 10/20/14
HAZARD KY 41701-5859	Previous balance \$153.79
	Payments (\$153.79)
	After Payments \$0.00

Billing Questions Please Call
606-439-3167

Current Month Activity

Date	Description of Service	Amount
11/1/2014 10	MEG RES/CABLE	11/01..11/30 \$84.95

For Closed Caption concerns: Contact Kenny Salmons, Ph:(606)785-3450 ext. 7105, Fax:(606) 785-3110, Email:kenny@tvscable.com, Mail: TVS Cable, ATTN: Kenny Salmons - Assistant Manager, PO Box 1410, Hindman, KY 41822

Please detach at the perforation, and enclose this portion with your Payment. Thank you!

Service Address:

HAZARD KY 41701-5859

PO Box 1410
Hindman, KY 41822

Due Date	Account No.	Previous Bal.	Payments	Current Charges	Amount Due	Amt Enclosed
Nov 5th						

Please indicate the amount enclosed, do not send cash!
Please make check or money order payable to:

TV Service, Inc.
P.O. Box 1410
Hindman, KY 41822

HAZARD, KY 41701-5859





Great Lakes Data

PO Box 1410
Hindman, KY 41822

606-439-3167

Bills are due by the 5th of each month. A late fee of \$5.00 will be added after this date. Please remit payment with bill stub.

Account Number	Due Date
	Nov 5th

Account Summary

Billing Date	Payments through:
HAZARD KY 41701-9408	Previous balance
	Payments
	After Payments

Billing Questions Please Call
606-439-3167

Current Month Activity

Date	Description of Service	Amount
11/1/2014 10	MEG BUSINESS	11/01..11/30 \$99.95

For Closed Caption concerns: Contact Kenny Salmons, Ph:(606)785-3450 ext. 7105, Fax:(606) 785-3110, Email:kenny@tvscable.com, Mail: TVS Cable, ATTN: Kenny Salmons - Assistant Manager, PO Box 1410, Hindman, KY 41822

Please detach at the perforation, and enclose this portion with your Payment. Thank you!

Service Address:

HAZARD KY 41701-9408

PO Box 1410
Hindman, KY 41822

Due Date	Account No.	Previous Bal.	Payments	Current Charges	Amount Due	Amt Enclosed
Nov 5th	034-008335	\$168.79	(\$168.79)	\$168.79	\$168.79	

Please indicate the amount enclosed, do not send cash!
Please make check or money order payable to:

TV Service, Inc.
P.O. Box 1410
Hindman, KY 41822

HAZARD, KY 41702-0660





Great Lakes Data

PO Box 1410
Hindman, KY 41822

606-439-3167

Bills are due by the 5th of each month. A late fee of \$5.00 will be added after this date. Please remit payment with bill stub.

Account Number	Due Date
	Nov 5th

Account Summary

Billing Date: HAZARD KY 41701-8956
 Payments through: After Payments
 Previous balance: [blacked out]
 Payments: [blacked out]

Billing Questions Please Call
606-439-3167

Current Month Activity

Date	Description of Service	Amount
11/1/2014	6MEG RES/NO CABL	11/01..11/30 \$52.45
11/1/2014	AREA WIDE CALLING	11/01..11/30 \$16.00
		11/01..11/30 (\$29.94)
11/1/2014	PHONE BASIC 500 MIN LD	11/01..11/30 \$44.99

For Closed Caption concerns: Contact Kenny Salmons, Ph:(606)785-3450 ext. 7105, Fax:(606) 785-3110, Email:kenny@tvscable.com, Mail: TVS Cable, ATTN: Kenny Salmons - Assistant Manager, PO Box 1410, Hindman, KY 41822

Please detach at the perforation, and enclose this portion with your Payment. Thank you!

Service Address:

HAZARD KY 41701-8956

PO Box 1410
Hindman, KY 41822

Due Date	Account No.	Previous Bal.	Payments	Current Charges	Amount Due	Amt Enclosed
Nov 5th						

Please indicate the amount enclosed, do not send cash!
Please make check or money order payable to:

TV Service, Inc.
P.O. Box 1410
Hindman, KY 41822

HAZARD, KY 41701





Great Lakes Data

PO Box 1410
Hindman, KY 41822

606-439-3167

Bills are due by the 5th of each month. A late fee of \$5.00 will be added after this date. Please remit payment with bill stub.

Account Number	Due Date
	Nov 5th

Account Summary

Billing Date: CORNETTSVILLE KY 41731-8533
 Payments through: Previous balance Payments After Payments

Billing Questions Please Call
606-439-3167

Current Month Activity

Date	Description of Service	Amount
11/1/2014	6MEG RES/NOCABL	11/01..11/30 \$52.45

For Closed Caption concerns: Contact Kenny Salmons, Ph:(606)785-3450 ext. 7105, Fax:(606) 785-3110, Email:kenny@tvscable.com, Mail: TVS Cable, ATTN: Kenny Salmons - Assistant Manager, PO Box 1410, Hindman, KY 41822

Please detach at the perforation, and enclose this portion with your Payment. Thank you!

Service Address:

CORNETTSVILLE KY 41731-853

Due Date	Account No.	Previous Bal.	Payments	Current Charges	Amount Due	Amt Enclosed
Nov 5th						

PO Box 1410
Hindman, KY 41822

Please indicate the amount enclosed, do not send cash!
Please make check or money order payable to:

TV Service, Inc.
P.O. Box 1410
Hindman, KY 41822

CORNETTSVILLE, KY 41731-0550



ATTACHMENT F

**Confidential Information Submitted Pursuant to
Protective Order and Withheld from Public Filing**

ATTACHMENT G

**Before the
Federal Communications
Commission Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund Phase II Challenge)	WC Docket No. 14-93
Process Subject Matter)	
)	
Replies Sought in Connect America Phase II)	DA 14-1397
Challenge Process)	
)	

**REQUEST FOR LIMITED WAIVER OF
CONNECT AMERICA FUND PHASE II EVIDENTIARY REQUIREMENT**

TV Service, Inc. (“TVS”), by counsel and pursuant to Section 1.3 of the Commission's Rules,¹ requests a limited waiver of the Wireline Competition Bureau’s (“Bureau”) evidentiary requirement that replies to challenges must include evidence of current or former customers in order to establish that the block is “served” for the purpose of determining whether a census block is eligible for Connect America Fund (“CAF”) Phase II support.

Several census blocks in which TVS offers service do not have, and have not had, customers. In 12 of these census blocks, TVS has, or has had, cable television subscribers. Cable television is provisioned over the same facilities TVS uses to provision voice and broadband service. The remaining five census blocks are very rural with very few households.

Since TVS is currently able to provide service to anyone requesting it in these blocks, making them available for CAF Phase II support would undermine the Commission’s determination that CAF funding should not be used to overbuild existing

¹ 47 C.F.R. 1.3.

unsubsidized infrastructure. Accordingly, TVS seeks a waiver of the customer requirement because these blocks are nevertheless “served.”

I. FACTUAL BACKGROUND

TVS is a locally owned and operated cable company providing voice telephone, Internet access, and cable television service in a service area comprising all or part of seven counties in eastern Kentucky. TVS is not an eligible telecommunications carrier and does not receive support from the high-cost Universal Service Fund program.

Windstream has filed a broad challenge claiming over 9,000 census blocks as “unserved” in an attempt to reclassify the census blocks as eligible for purposes of CAF Phase II support. The challenge included 86 census blocks identified with TVS. As demonstrated in TVS’s response to Windstream’s challenge, TVS advertises voice and broadband service meeting the Commission’s CAF Phase II requirements, has physical infrastructure supporting Internet access exceeding the Commission’s speed threshold, and has current and former customers in 69 of the 86 census blocks.

Although all of the blocks in question have access to service, 17 blocks do not have current or former voice and/or broadband customers. In 12 of those census blocks, TVS has current or former subscribers to its *cable television* service:

211939705001039
211939705003013
211939705004067
211939705004096
211939707002000
211939708001002
211939709001001
211939710002029
211939710002036
211939710002054
211939710003013
211939710004022

While the Commission did not list cable television alongside voice and broadband service in specifying the types of current or former customers a census block have, TVS uses the same physical plan to provide cable television as it does voice and broadband service. As discussed in the declaration of David Thacker provided as Attachment B, the physical infrastructure capable of providing voice and/or broadband service in these areas is already in place. Therefore, provisioning voice or broadband to these customers would be a simple matter of installing customer premise equipment and activating service. These 12 census blocks should be considered served because customers have already been connected to the required facilities.

The remaining five census blocks should be considered served because they are very rural with few households. According to 2010 U.S. Census data, four of these census blocks have fewer than 10 households:

211339506007034	8 households
211939709001039	4 households
211939710002013	1 household
211939710003009	2 households

The fifth census block (211939709001075) has 21 households but is very sparsely populated with only 4.4 households per square mile.

As a result of their sparse population, these blocks have no subscribers even though service is readily available. Although TVS has not had customers in those census blocks to date, as discussed in the Thacker Declaration, TVS has facilities in all of the census blocks and can provide voice service within 10 days of a request.

II. GOOD CAUSE EXISTS FOR WAIVER OF THE CUSTOMER REQUIREMENT

Section 1.3 of the Rules permits the Commission's rules to be waived for good cause shown. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.² In addition, the Commission may take into account considerations of hardship, equity, and the effective implementation of public policy on an individual basis.³

The Bureau waived the customer requirement several times in the initial round of the CAF Phase II Challenge Process.⁴ In so doing, the Bureau explicitly recognized that the public interest would be served in waiving the requirement in circumstances such as these, where, “low population density ... explains[s] the lack of a current or former customer.”⁵

In the *USF/ICC Transformation Order* of 2011, the Commission determined that funding should not be directed to areas where unsubsidized competitors offer service.⁶ The rationale for this finding was a policy determination that CAF support should only be directed to areas where market forces have not provided sufficient incentives to deploy broadband already. In the Commission’s own words, “[w]e cannot and will not condone new investment subsidized by universal service funds to occur in areas that are already served by marketplace forces...”⁷ Further, subsidizing the deployment of facilities in areas where unsubsidized providers have already done so undermines competition and chills investment.

² *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

³ *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972).

⁴ Public Notice, *Replies Sought in Connect America Phase II Challenge Process* WC Docket No. 10-90 and 14-93, DA 14-1397 (rel. Sept. 26, 2014) at pp. 3-4.

⁵ *Id.* at pages 3-4.

⁶ *Connect America Fund et al.*, 26 FCC Rcd 17663, 17729 (2011) (“*USF/ICC Transformation Order*”).

⁷ *Connect America Fund et al.*, 29 FCC Rcd 7051, 7073 (2014).

Good cause exists for the requested waiver because, as in the case of previous waivers, the lack of a customer or former customer is explained by the circumstances, and is not indicative of a lack of service. The census blocks in question are extremely rural areas with very few households, and as a result the number of potential customers is similarly low.

CAF Phase II support has the stated purpose of extending service to areas that are unserved. If a census block is extremely rural and has only one household, and that household has not elected to subscribe to service that can be readily provided by an unsubsidized competitor, then the census block should be considered “served” for purposes of CAF Phase II. So, too, should a census block with current or former cable television customers, since the facilities needed for voice and broadband service are already in place.

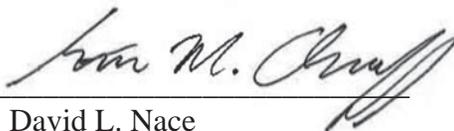
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III. CONCLUSION

Good cause, as well as considerations of equity and the effective implementation of the Commission's universal service policies, warrant grant of TVS's requested waiver of the customer requirement. The requested waiver is consistent with Commission and Bureau precedent, and is supported by the facts discussed herein.

Respectfully submitted,

TV SERVICE, INC.

By: 
David L. Nace
Steven M. Chernoff
LUKAS, NACE, GUTIERREZ & SACHS,
LLP
8300 Greensboro Drive, Suite 1200
McLean, VA 22102
(703) 584-8669

Its Attorneys

November 10, 2014

ATTACHMENT H

Census Block	Download Speed	Upload Speed
211199605004049	14.50 Mbps	1.49 Mbps
211339502005042	14.29 Mbps	1.93 Mbps
211339506002002	14.50 Mbps	1.73 Mbps
211339506006013	14.49 Mbps	1.49 Mbps
211339506007018	12.95 Mbps	1.74 Mbps
211339506007034	not in area	
211339506007038	14.62 Mbps	1.50 Mbps
211939704002042	not in area	
211939705001000	14.14 Mbps	1.49 Mbps
211939705001007	14.47 Mbps	1.75 Mbps
211939705001010	14.51 Mbps	1.52 Mbps
211939705001024	14.49 Mbps	1.49 Mbps
211939705001026	14.48 Mbps	1.48 Mbps
211939705001032	14.36 Mbps	1.48 Mbps
211939705001036	14.48 Mbps	1.49 Mbps
211939705001039	14.46 Mbps	1.48 Mbps
211939705002020	14.51 Mbps	1.49 Mbps
211939705002025	14.58 Mbps	1.49 Mbps
211939705002042	14.49 Mbps	1.52 Mbps
211939705003013	14.48 Mbps	1.68 Mbps
211939705003033	14.50 Mbps	1.72 Mbps
211939705003035	14.42 Mbps	1.77 Mbps
211939705003038	14.50 Mbps	1.49 Mbps
211939705003039	14.34 Mbps	1.96 Mbps
211939705003044	14.50 Mbps	1.73 Mbps
211939705004061	14.49 Mbps	1.72 Mbps
211939705004067	14.48 Mbps	1.49 Mbps
211939705004095	14.37 Mbps	1.49 Mbps
211939705004096	12.10 Mbps	1.74 Mbps
211939707001000	14.49 Mbps	1.77 Mbps
211939707001002	14.38 Mbps	1.76 Mbps
211939707001009	14.48 Mbps	1.70 Mbps
211939707001010	14.47 Mbps	1.75 Mbps
211939707002000	14.53 Mbps	1.48 Mbps
211939707002033	14.50 Mbps	1.98 Mbps
211939707002035	14.50 Mbps	1.49 Mbps
211939708001002	14.38 Mbps	1.76 Mbps
211939708001005	14.52 Mbps	1.96 Mbps
211939708001006	14.49 Mbps	1.49 Mbps
211939708001015	14.49 Mbps	1.68 Mbps
211939708001022	14.56 Mbps	1.49 Mbps
211939708002021	14.48 Mbps	1.73 Mbps
211939708002035	14.50 Mbps	1.49 Mbps
211939708002051	14.50 Mbps	1.96 Mbps
211939708002056	14.47 Mbps	1.49 Mbps
211939708002064	14.49 Mbps	1.51 Mbps

211939708002068	11.87 Mbps	1.73 Mbps
211939708003000	13.99 Mbps	1.68 Mbps
211939708003005	14.47 Mbps	1.75 Mbps
211939709001001	14.49 Mbps	1.52 Mbps
211939709001013	14.50 Mbps	1.96 Mbps
211939709001031	14.54 Mbps	1.48 Mbps
211939709001038	14.48 Mbps	1.98 Mbps
211939709001039	14.50 Mbps	1.73 Mbps
211939709001043	14.52 Mbps	1.71 Mbps
211939709001045	12.74 Mbps	1.56 Mbps
211939709001047	14.49 Mbps	1.58 Mbps
211939709001068	14.51 Mbps	1.48 Mbps
211939709001071	14.46 Mbps	1.97 Mbps
211939709001075	14.48 Mbps	1.73 Mbps
211939709002000	14.28 Mbps	1.97 Mbps
211939709002043	13.69 Mbps	1.62 Mbps
211939710002013	14.51 Mbps	1.73 Mbps
211939710002021	11.46 Mbps	1.81 Mbps
211939710002029	14.46 Mbps	1.49 Mbps
211939710002031	14.49 Mbps	1.49 Mbps
211939710002032	14.52 Mbps	1.76 Mbps
211939710002034	14.49 Mbps	1.79 Mbps
211939710002035	14.50 Mbps	1.72 Mbps
211939710002036	14.29 Mbps	1.71 Mbps
211939710002038	12.61 Mbps	1.79 Mbps
211939710002039	14.27 Mbps	1.77 Mbps
211939710002040	14.50 Mbps	1.50 Mbps
211939710002043	14.13 Mbps	1.76 Mbps
211939710002045	14.48 Mbps	1.49 Mbps
211939710002054	14.46 Mbps	1.74 Mbps
211939710002055	14.53 Mbps	1.49 Mbps
211939710003000	14.48 Mbps	1.48 Mbps
211939710003004	14.49 Mbps	1.70 Mbps
211939710003009	14.47 Mbps	1.49 Mbps
211939710003013	14.49 Mbps	1.74 Mbps
211939710003030	13.96 Mbps	1.49 Mbps
211939710004020	14.46 Mbps	1.49 Mbps
211939710004022	14.21 Mbps	1.97 Mbps
211339502006001	13.90 Mbps	1.64 Mbps
211339506007016	14.48 Mbps	1.49 Mbps