



Service Electric's own service representatives admit that it does not in fact serve all locations in all the census blocks it purports to serve. Service Electric does not have an automated system that enables potential customers to identify whether Service Electric can serve their locations. However, Alteva's partial review demonstrates that there are a minimum of 6 census blocks in which Service Electric does not serve all locations.

As NTIA's Comments state (at p. 2), the Bureau should "require every purported unsubsidized competitor . . . to verify their ability to provide public service meeting the applicable voice and broadband performance metrics to all of the customer locations in the RLEC study areas at issue." Service Electric's failure to provide such evidence – combined with the admissions of its own representatives – proves fatal to any claim that Service Electric's service meets the clear and stringent standards of 47 C.F.R. §319(a), and it prevents any Bureau finding that Warwick Valley's Universal Service support in the New Jersey study area should be reduced.

Respectfully submitted,

By: /s/ Richard H. Rubin

Richard H. Rubin  
William K. Mosca, Jr.  
BEVAN, MOSCA & GIUDITTA, P.C.  
222 Mount Airy Road, Suite 200  
Basking Ridge, New Jersey 07920  
(908) 753-8300  
*Counsel for Alteva, Inc.*

Dated: September 28, 2015

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	WC Docket Nos. 10-90, et al.
Connect America Fund, et al.	)	
	)	

**JOINT REPLY DECLARATION OF KATHRYN CANCEL AND VIRGINIA  
O'HANLON**

1. We are Kathryn Cancel, Director of Customer Service for Alteva, Inc. (“Alteva”) (f/k/a Warwick Valley Telephone Company), the corporate parent of Alteva of Warwick LLC (“Warwick Valley”), and Virginia O’Hanlon, Alteva’s Regulatory Compliance and Tax Manager. We submitted a Joint Declaration in this docket on August 28, 2015 in support of Alteva’s Comments.

2. Since that time, we conducted some additional inquiries with Service Electric Cable TV’s Customer Service Center, which we report below.

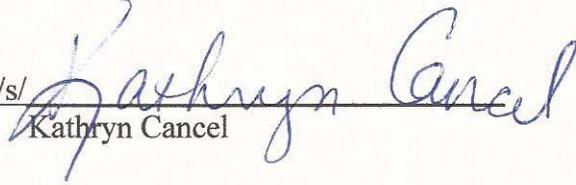
3. 116 Sand Hill Road, Vernon, New Jersey - Census Block 340373717001000. On September 24, 2015, Virginia O’Hanlon called the Service Electric Customer Service Center and asked a representative named Diane whether Service Electric provided services at this address. Diane advised Ms. O’Hanlon that Service Electric provides service up to 76 Sand Hill Road but not beyond that point at this time. She said that they would have to go out and do a site survey to see if it would be possible to run the cable that far. It would depend on how far apart the houses are and how far from the road the home is. As noted in the Public Notice, Cablevision does not purport to serve this area of New Jersey, and Ms. O’Hanlon verified that through the CSC website service availability tool.

4. 27 Guthrie Road, Vernon, New Jersey – Census Block 340373176003009. On September 24, 2015, Kathryn Cancel called the Service Electric Customer Service Center and asked a representative named Karen whether Service Electric provided services at this address. Karen advised Mrs. Cancel that Service Electric has not provided service to this location and would need to perform a site survey to see if they can service the area. As noted in the Public Notice, Cablevision does not purport to service this area in New Jersey and Ms. O’Hanlon checked the service availability tool on the CSC website and service is not available in this area.

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 25, 2015

/s/   
Kathryn Cancel

**VERIFICATION**

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 25, 2015

/s/ Virginia O'Hanlon  
Virginia O'Hanlon