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April 27, 2016

Via ECFS

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

**Re: WC Docket No. 10-90
Northeast Iowa Telephone Company Challenge to A-CAM V2.2
Competitive Coverage of Ace Telephone Association and
Competitive Coverage of Colo Telephone Company**

Dear Ms. Dortch:

On behalf of Northeast Iowa Telephone Company. (“NEIT”), JSI files the attached NEIT comments to challenge the competitive coverage contained in Alternative Connect America Cost Model (“A-CAM”) version 2.2 pursuant to the streamlined challenge process established by Public Notice.¹

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

Attachment

¹ See Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process to Competitive Coverage, WC Docket No. 10-90, Public Notice (rel. Apr. 7, 2016) (“Public Notice”).

Northern Clayton Counties, which are served only by ADSL Broadband over copper, capable of maximum speeds of 9 Mbps downstream and 1.5 Mbps upstream.

The Company's Study Area Code ("SAC") is 351230 and its FCC Registration Number ("FRN") is 0002594893. As further outlined below, the Company maintains that the latest version of the A-CAM contains errors that are significantly impacting the total number of locations eligible for support by excluding census blocks where Form 477 data erroneously indicates the presence of unsubsidized competitive providers. These errors in the A-CAM model significantly reduce NEIT's potential model-based support.

Through this petition, NEIT is not challenging all competitive overlap information within the A-CAM for its study area, as there are some unsubsidized competitors operating in a few of the Company's census blocks in compliance with the Commission's standards, but there are certain census blocks that contain erroneous competitive overlap findings, which NEIT is seeking to have corrected in the next release of the A-CAM.

II. DEMONSTRATION OF ERRONEOUS COMPETITIVE FORM 477 DATA

In regard to unsubsidized competitors identified in certain census blocks within NEIT's study area in the latest A-CAM, the Company submits challenges to the following providers based primarily on grounds that their broadband service offerings do not meet the FCC's criteria to be considered an unsubsidized competitor, including broadband speeds and prices.

As the FCC noted in its *USF Reform Order*, in order to be considered an unsubsidized competitor, a provider must offer broadband service that is at least capable of providing 10/1 Mbps service within a rate-of-return carrier's study area.³ However, as further addressed below, the identified competitive providers do not offer broadband service in census blocks within the Company's study area.

ACE TELEPHONE ASSOCIATION (FRN: 0002645927)

According to the A-CAM, Ace Telephone Association offers ADSL2 services (technology code 11) in census blocks 190059604002189, 190059604002199 and 190059604002202 in NEIT's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Ace Telephone Association (data as of June 30, 2015). As

³ *USF Reform Order* at footnote 31.

demonstrated in Attachment 1, Ace Telephone Association does not offer any broadband service in this block in NEIT's study area. Accordingly, Ace Telephone Association erroneously reported these blocks as ones in which it offers broadband service and, in the next release of the A-CAM, this block should be not be shown as one in which Ace Telephone Association offers service as an unsubsidized competitor.

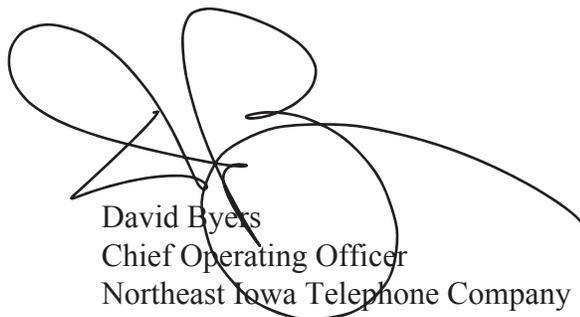
COLO TELEPHONE COMPANY (FRN: 0003731759)

According to the A-CAM, Colo Telephone Company offers Optical Carrier/FTTH services (technology code 50) in census block 190430701002032 in NEIT's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Colo Telephone Company (data as of June 30, 2015). As demonstrated in Attachment 2, Colo Telephone Company does not offer any broadband service in this block in NEIT's study area. Accordingly, Colo Telephone Company erroneously reported this block as one in which it offers broadband service and, in the next release of the A-CAM, this block should be not be shown as one in which Colo Telephone Company offers service as an unsubsidized competitor.

III. CONCLUSION

For the reasons stated above, NEIT respectfully requests, pursuant to the *Public Notice* and paragraph 71 of the *USF Reform Order*, that the Commission find the evidence submitted herein to be sufficient to correct the erroneous exclusion of certain census blocks in the latest A-CAM such that NEIT can make an informed decision as to whether or not it wishes to opt for model-based support and to such other relief, as the Company may be justly entitled.

Respectfully submitted,



David Byers
Chief Operating Officer
Northeast Iowa Telephone Company

Filed April 27, 2016

Attachments

Attachment 1

DECLARATION OF Brian Jerviss

I, Brian Jerviss, am the Engineering Supervisor of Ace Telephone Association (“Ace”).

I verify that Ace does not provide broadband service as an unsubsidized competitor in the census blocks listed below, which are within Northeast Iowa Telephone Company’s incumbent telephone service area.

Census Blocks Erroneously Reported By Ace:

190059604002189
190059604002199
190059604002202

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

Executed on April 25, 2016



Brian Jerviss

Ace Telephone Association

FRN: 0002645927

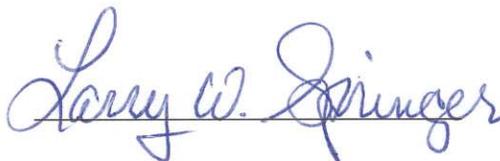
Attachment 2

DECLARATION OF LARRY SPRINGER

I, Larry Springer, am General Manager and CEO of Colo Telephone Company ("Colo"). I have personal and direct knowledge of the representations made by Northeast Iowa Telephone Company in its April 27, 2016 Comments to the Federal Communications Commission, Docket No. 10-90 regarding the Company's service area and competitive overlap. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I verify that Colo does not provide broadband service as an unsubsidized competitor in Northeast Iowa Telephone Company's incumbent telephone service area.

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

Executed on April 22, 2016



Larry Springer
General Manager and CEO
Colo Telephone Company
FRN: 0003731759