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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
Bruce Telephone Company and Fulton Telephone Company
Challenge to A-CAM V2.2 Competitive Coverage of
BCI Mississippi Broadband, LLC**

Dear Ms. Dortch:

On behalf of Bruce Telephone Company (“Bruce”) and Fulton Telephone Company (“Fulton”), JSI files the attached Bruce and Fulton 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”).

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 reduces Bruce and Fulton's potential model-based support.

Through this petition, Bruce and Fulton are not challenging all competitive overlap information within the A-CAM for its study area, as there are some competitive providers operating in a few of the Companies' census blocks in compliance with the Commission's standards, but there are certain census blocks that contain erroneous competitive overlap findings, which Bruce and Fulton are 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 Bruce and Fulton's study area in the latest A-CAM, the Companies submit 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 Companies' study areas.

a. Bruce Telephone Company Challenge to BCI Mississippi Broadband, LLC

According to the A-CAM, BCI Mississippi Broadband, LLC ("BCI") offers cable modem services (technology code 42) in the census blocks listed in Attachment A in Bruce's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by BCI (data as of June 30, 2015). As demonstrated in the declarations in Attachment A, BCI does not offer any broadband service in the blocks listed in Attachment A. Accordingly, BCI erroneously reported these blocks as ones in which it offers broadband service and, in the next release of the A-CAM, these blocks should be not be shown as ones in which BCI offers service as an unsubsidized competitor.

³ *USF Reform Order* at footnote 31.

b. Fulton Telephone Company Challenge to Comcast Cable Communications, LLC

According to the A-CAM, Comcast Cable Communications, LLC (“Comcast”) offers cable modem services (technology code 42) in the census blocks listed in Attachment B in Fulton’s study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Comcast (data as of June 30, 2015). As demonstrated in the evidence of “no service available” screenshots from Comcast’s website (Attachment C), e-mail correspondence about service availability in Fulton where Comcast confirms that it does not offer Internet or voice service (Attachment D), and an affidavit from a local business owner who unable to subscribe to Comcast voice or Internet service (Attachment E); Comcast does not offer any broadband service in the blocks listed in Attachment B. Accordingly, Comcast erroneously reported these blocks as ones in which it offers broadband service and, in the next release of the A-CAM, these blocks should be not be shown as ones in which Comcast offers service as an unsubsidized competitor.

III. CONCLUSION

For the reasons stated above, Bruce and Fulton Telephone Companies respectfully request, 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 Bruce and Fulton 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,

/s/ Christa Alexander
Vice President of Operations
Fail Telecommunications Corporation

Filed April 27, 2016

Attachments

AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF CALHOUN

Personally appeared before me, the undersigned authority in and for said state and county, within my jurisdiction, Amanda Vanlandingham, who after being duly sworn, says that (s)he has called BCI Mississippi Broadband, LLC d/b/a Maxxsouth Broadband on April 26, 2016, and inquired about broadband coverage on the following roads:

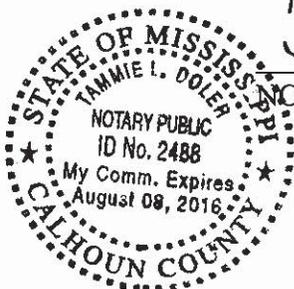
- CALHOUN COUNTY ROAD 233
- CALHOUN COUNTY ROAD 282
- CALHOUN COUNTY ROAD 275
- CALHOUN COUNTY ROAD 277
- CALHOUN COUNTY ROAD 272
- CALHOUN COUNTY ROAD 414
- CALHOUN COUNTY ROAD 149
- CALHOUN COUNTY ROAD 151
- CALHOUN COUNTY ROAD 163

located in census blocks numbered 280139501002050, 280139503002056, 280139501003022, 280139501003007, and 280139501002034, and in response to (her) his inquiries as to all of the above-named roads, was told that BCI Mississippi Broadband, LLC d/b/a Maxxsouth Broadband does not offer service on said roads.

Amanda Vanlandingham
Amanda Vanlandingham (print name)

SWORN TO AND SUBSCRIBED BEFORE ME, this the 26th day of April, 2016.

My commission expires:



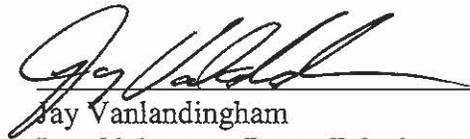
Tammie L Doler
NOTARY PUBLIC

AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF CALHOUN

Personally appeared before me, the undersigned authority in and for said state and county, within my jurisdiction, Jay Vanlandingham, Local Manager of Bruce Telephone Company, Inc., who after being duly sworn, says that he has personally viewed census blocks numbered 280139501002050, 280139503002056, 280139501003022, 280139501003007, and 280139501002034, and that within said census blocks there are no coaxial cables on poles or underground, nor are there any other coaxial cable facilities over which BCI Mississippi Broadband, LLC d/b/a Maxxsouth Broadband could deliver internet and/or voice services.

I, Jay Vanlandingham, viewed the aforementioned census blocks on April 14, 2016.



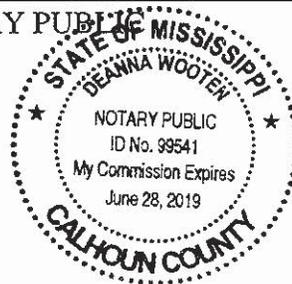
Jay Vanlandingham
Local Manager, Bruce Telephone Company

SWORN TO AND SUBSCRIBED BEFORE ME, this the 26th day of April, 2016.



NOTARY PUBLIC

My commission expires:



ATTACHMENT B

**COMCAST CENSUS BLOCKS THAT SHOULD NOT ELIMINATE
FULTON TELEPHONE COMPANY FROM A-CAM SUPPORT**

280579501003031

280579501003037

280579502002017

280579502002018

280579502002019

280579502002020

280579502002022

280579502002027

280579502002066

280579502002070

280579502002071

280579502003008

280579502003013

280579502003017

280579502003024

280579502003054

280579502003055

280579502003091

280579502003094

280579502004000

280579502004004

280579502004007

280579502004008

280579502004010

280579502004015

280579502004020

280579502004021

280579502004026

280579502004029

280579503002058

280579503002067

280579503003003

280579503003005

280579503003023

280579503003047

280579504002125

280579504003038

280579505001043

280579505002004

280579505002009

ATTACHMENT C - "NO SERVICE AVAILABLE" RESULTS

Shop

My Account

Support

My XFINITY

- Products [Products](#)
- Bundles & Deals [Bundles & Deals](#)
- Programming [Programming](#)
- Customers [Customers](#)

Search

[En Español](#)

Submit Query

Get the
 XFINITY®
 Double Play
 today

See below for the best deals in the area.

[View XFINITY Latino Packages](#)

[See Internet only offers](#)

Browse XFINITY® Double Play
 Offers

TV and Internet bundle service is not available for Fulton, MS 38843

- Sorry, Selected service is not available.
- [Change Location](#)

/sitecore/content/ngbf_comcast_com/Content/Products/Learn Pages/Double Play/Blast Plus
Exclude Offer Finder
EPC

products|shop|learn|nextgen double play

The offer for the service package you have selected requires a minimum term agreement. The agreement will be sent to the mail or email address you provided. Under the agreement, if you cancel or downgrade any services included with your package before the agreement expires, you will be billed the early termination fee specified in the agreement, unless you cancel within the first 30 days after installation or activation, as applicable. You may cancel the agreement by calling 1-800-COMCAST. If you cancel within 30 days of the date service is installed or activated, and return any equipment you have received from us, the early termination fee will not be charged. If you do not cancel the agreement, you will automatically be billed and the terms of the minimum term agreement will apply.

Acceptance of these terms will occur at checkout.

14907 00000000-0000-0000-0000-000000000000 00000000-0000-0000-0000-000000000000
146e0f55-9906-4b44-8b13-fd8f2bf3f2c4

Internet and Voice bundle service is not available for Fulton, MS 38843

- Sorry, Selected service is not available.
- [Change Location](#)

/sitecore/content/ngbf_comcast_com/Content/Products/Learn Pages/Double Play/DP Offer
Finder
EPC

products|shop|learn|nextgen double play

The offer for the service package you have selected requires a minimum term agreement. The agreement will be sent to the mail or email address you provided. Under the agreement, if you cancel or downgrade any services included with your package before the agreement expires, you will be billed the early termination fee specified in the agreement, unless you cancel within the first 30 days after installation or activation, as applicable. You may cancel the agreement by calling 1-800-COMCAST. If you cancel within 30 days of the date service is installed or activated, and return any equipment you have received from us, the early termination fee will not be charged. If you do not cancel the agreement, you will automatically be billed and the terms of the minimum term agreement will apply.

Acceptance of these terms will occur at checkout.

14907 00000000-0000-0000-0000-000000000000 00000000-0000-0000-0000-000000000000
146e0f55-9906-4b44-8b13-fd8f2bf3f2c4

ATTACHMENT C - "NO SERVICE AVAILABLE" RESULTS

The screenshot shows the Xfinity website interface. At the top, there is a navigation bar with links for "Comcast: Cable TV, Internet & Phone | XFINITY® Official Site - Mozilla Firefox", "File Edit View History Bookmarks Tools Help", and "Comcast: Cable TV, Internet &... x +". Below this is a search bar and a navigation menu with icons for home, search, and other functions. The main content area displays a grid of service plans. A modal dialog box is overlaid on the screen, displaying the message: "Your request couldn't be processed. Sorry, Selected service not available for your location." with an "OK" button. The background shows service plans with details like "Performance Starter" (10 Mbps) and "Performance" (25 Mbps), each with an "Add To Cart" button and a note about "Pricing & Other Info.".

Service Plan	Speed (Mbps)	Price (per month)	Notes
Performance Starter	10	\$19.99	Light streaming and surfing the web for the first 12 months
Performance	25	\$66.95	and photos on 2-4 devices at the same time.
Extreme 150	150	\$99.99	Download TV shows in seconds, upload large files, and multiplayer

ATTACHMENT C - "NO SERVICE AVAILABLE" RESULTS

[Products](#)[Bundles & Deals](#)[Programming](#)[Customers](#)

We're sorry. Comcast service is not currently available at this address.



Please call toll-free: 1-855-718-0392

to get connected to the best TV, internet and phone services.
Thank you for using cablemover.com!

Powered by **CABLEMOVER**

885 Mantachie Creek Rd, 38855

[Re-enter Address](#)

block 280579502003013

Please visit Cablemover.com or call 866-408-1733 to find the Cable TV and Internet providers servicing your area.

If you believe you've reached this page in error, please contact Comcast at 1-877-821-9868.

[Go to Cablemover.com](http://Cablemover.com)

Please visit Cablemover.com or call 866-408-1733 to find the Cable TV and Internet providers servicing your area.

If you believe you've reached this page in error, please contact Comcast at 1-877-821-9868.

[Go to Cablemover.com](http://Cablemover.com)

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ATTACHMENT C - "NO SERVICE AVAILABLE" RESULTS

What are you shopping for?

in **Mantachie, MS**Not Your Location? [Change Location](#)Current Customer? [See Offers](#)

Television

Internet

Phone

Home

[See Offers](#)

Internet and Voice bundle service is not available for Mantachie, MS 38855

- Sorry, Selected service is not available.
- [Change Location](#)

/sitecore/content/ngbf_comcast_com/Content/Common/Offer Finder 2-HP
EPC

home|comcast - nextgen - home

The offer for the service package you have selected requires a minimum term agreement. The agreement will be sent to the mail or email address you provided. Under the agreement, if you cancel or downgrade any services included with your package before the agreement expires, you will be billed the early termination fee specified in the agreement, unless you cancel within the first 30 days after installation or activation, as applicable. You may cancel the agreement by calling 1-800-COMCAST. If you cancel within 30 days of the date service is installed or activated, and return any equipment you have received from us, the early termination fee will not be charged. If you do not cancel the agreement, you will automatically be billed and the terms of the minimum term agreement will apply.

Acceptance of these terms will occur at checkout.

14911

[Close](#)

ATTACHMENT D - CONFIRMATION COMCAST NOT AVAILABLE

RE: Comcast Business/Grocery Store

WilezolJr, Richard

Mon 4/25/2016 3:51 PM

To: Chad Benoit <chadwickbt@hotmail.com>;

Yes sir, unfortunately...

From: Chad Benoit [mailto:chadwickbt@hotmail.com]
Sent: Monday, April 25, 2016 4:49 PM
To: WilezolJr, Richard <Richard_WilezolJr@cable.comcast.com>
Subject: Re: Comcast Business/Grocery Store

Richard:

Thanks so much for your response. Am I correct that you only offer TV in Fulton, Mississippi, 38843, and don't offer internet or voice service, at this time?

-Chad

From: noreply@salesforce.com <noreply@salesforce.com> on behalf of Richard Wilezol Jr <richard_wilezoljr@cable.comcast.com>
Sent: Tuesday, April 19, 2016 10:45 AM
To: chadwickbt@hotmail.com
Subject: Comcast Business/Grocery Store



Follow Up from Comcast Busin

Thanks for your interest in Comcast Business...how can I help?

Dear Chad,

Hello! I'm Richard, a representative for Comcast Business. You indicated on our website that you would like someone to contact you regarding Comcast Business, and I'd like to answer any questions you may have. I would like to talk to you to discuss how Comcast Business can provide the right communications technology to help your company be successful in today's fast-moving environment.

We stand behind our products and services with the Comcast Promise: 24x7 dedicated business support everywhere — phone, web and online — with a money back guarantee. If you're not satisfied, neither am I.

I'll call you shortly to see how I can help! Or if you prefer, I would enjoy the opportunity to follow up at a specific time.

Sincerely,
Richard Wilezol Jr
OBSR, SMB Direct Sales

T: (610) 596-4041 | business.comcast.com

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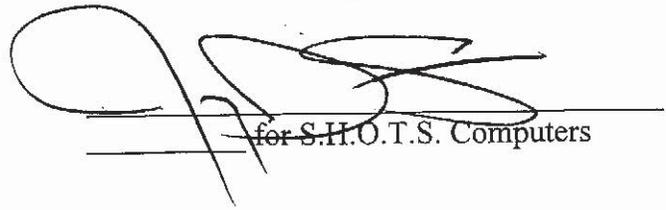


AFFIDAVIT

STATE OF MISSISSIPPI
COUNTY OF ITAWAMBA

Personally appeared before me, the undersigned authority in and for said state and county, within my jurisdiction, Jerry Smith of S.H.O.T.S. Computers, who after being duly sworn, says that the aforesaid S.H.O.T.S. Computers has inquired with Comcast Cable about acquiring internet and voice services from Comcast Cable, and was given a quote to which S.H.O.T.S. Computers agreed, but that when the installation was scheduled, S.H.O.T.S. Computers was called by Comcast Cable and informed that Comcast Cable does not offer internet and/or voice services in Fulton, Itawamba County, Mississippi.

The consultation with Comcast Cable and subsequent notification that service was not available in Fulton, Itawamba County, Mississippi occurred on or about January 20, 16.


_____ for S.H.O.T.S. Computers

SWORN TO AND SUBSCRIBED BEFORE ME, this the 26th day of April, 2016.

Angela McGee
NOTARY PUBLIC

