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is our business.

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April 28, 2016

**Via Hand Delivery**

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

**Re: WC Docket No. 10-90  
Fremont Telcom Co. Challenge to A-CAM V2.2**

Dear Ms. Dortch:

On behalf of Fremont Telcom Co. ("Fremont"), JSI files the attached confidential version of the Fremont 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.<sup>1</sup> A redacted version has been filed this date via the Electronic Comment Filing System. Fremont seeks confidential treatment as a Reviewing Party licensed under the Third Supplemental Protective Order for protection of Connect America Cost Model derived data.<sup>2</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Katie King, Telecommunications Access Policy Division (two copies, confidential)  
Margaret Avril Lawson, CostQuest Counsel, (via email)

<sup>1</sup> 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").

<sup>2</sup> In the Matter of Connect America Fund, Third Supplemental Protective Order, DA 12-1995, rel. Dec. 11, 2012.



April 28, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, NW  
Washington, DC 20554

***Via Hand Delivery***

***RE: In the Matter of Connect America Fund, WC Docket No. 10-90***

Dear Ms. Dortch:

Fremont Telcom Co. ("Fremont") is a rural, rate-of-return, incumbent local exchange carrier providing voice and data services in southeastern Idaho. Fremont is a wholly-owned subsidiary of Blackfoot Telephone Cooperative, Inc. ("Blackfoot"). Fremont's study area code is 472222.<sup>1</sup>

On March 30, 2016, the Federal Communications Commission ("FCC" or "Commission") released a Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking ("USF Reform Order") in the above-captioned proceeding. As part of the USF Reform Order, the Commission directed the Wireline Competition Bureau ("WCB") to incorporate the recently released June 2015 FCC Form 477 data, and to provide a final opportunity for commenters to challenge the competitive coverage contained in the updated version of the model.<sup>2</sup>

By this letter, Fremont hereby challenges some of the alleged competitive overlap contained in the model. There are two situations in which the model incorrectly indicates competitive overlap in Fremont's area.

First, the model erroneously shows the ILEC, "Fremont Telcom Co.," as providing technology type 11 (ADSL 2) "competitive" broadband services in several hundred census blocks within Fremont's own ILEC study area. The attached "Exhibit A," incorporated herein by this reference, lists the census blocks where the model indicated Fremont Telcom Co. is providing competitive broadband services. Fremont Telcom Co. cannot in any way be characterized as a "competitive" broadband provider in its own territory; it is the rate-of-return ILEC providing broadband services as the ILEC within

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<sup>1</sup> Fremont has two study area codes: 472222 and 473333. The SAC of 473333 was created as a result of Blackfoot's acquisition of Fremont from Fairpoint Communications in 2013, and is used by the Universal Service Administration Corporation for administrative purposes.

<sup>2</sup> USF Reform Order, ¶ 71.

Marlene H. Dortch  
Secretary  
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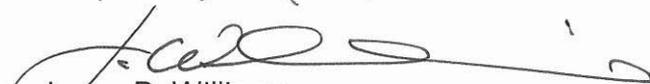
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the boundaries of its study area. Apparently, there is a data error in the latest version of the model that classifies the ILEC, Fremont Telcom Co., as a "competitive" provider when it should be recognized as the ILEC and not impact A-CAM support. Accordingly, the model must be updated to remove or correct the data indicating that Fremont Telcom Co. is not providing competitive broadband services within Fremont's ILEC study area. The FCC must then also ensure that the locations in census blocks contained in Exhibit A are no longer considered ineligible as the erroneous competitive overlap data will have been removed.

Second, the model shows Direct Communications as being a "competitive" company that provides service in approximately seven (7) census blocks totally within Fremont's ILEC service territory. These seven census blocks are identified in "Exhibit B." Direct Communications is not a "competitive" company but instead is a neighboring ILEC that evidently has misreported census blocks that are entirely within Fremont's study area. Attached as "Exhibit C" is a letter from a Direct Communications representative stating that the company does not provide any services within the seven census blocks identified on the attached "Exhibit B." Accordingly, Direct Communications is not a "competitive" company, and the model should be corrected to fix this error.

Please contact me if you have any questions or require further information on this matter.

Respectfully Submitted,



Jason B. Williams  
Chief Operating Officer  
406-541-5454

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**EXHIBIT A**

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FRN:  
0  
ACAM Scenario:  
6.4

FREMONT TELECOM-ROR  
473333

Competition Summary

Census	Blocks	List Competitive Company and Technology Code
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[REDACTED]		
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FRN:  
0  
ACAM Scenario:  
6.4

FREMONT TELECOM-ROR  
473333  
Competition Summary

Census	Blocks	1st Competitive Company and Technology Code
--------	--------	---------------------------------------------

[REDACTED]		
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FRN:  
0  
ACAM Scenario:  
6.4

FREMONT TELECOM-ROR  
473333

Competition Summary

Census	Blocks	1st Competitive Company and Technology Code
--------	--------	---------------------------------------------

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FRN:  
0  
ACAM Scenario:  
6.4

FREMONT TELECOM-ROR  
473333  
Competition Summary

Census	Blocks	1st Competitive Company and Technology Code
--------	--------	---------------------------------------------



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FRR:  
0  
ACAM Scenario:  
6.4

FREMONT TELECOM-ROR  
473333  
Competition Summary

Census	Blocks
--------	--------



1st Competitive Company and Technology Code

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**EXHIBIT B**

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FRN:

0

ACAM Scenario:

6.4

Census Blocks	Competitive Company and Technology Code
	

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**EXHIBIT C**



Corey,

In response to your request, Direct Communications does not provide service as shown in green on the A-CAM map in the Fremont County or surrounding areas of St. Anthony, Idaho as indicated on the map.

Brian Lee

Accounting

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BLACKFOOT - FREMONT TELCOM A-CAM COMPETITION ANALYSIS



MAP REDACTED IN ENTIRETY

