

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

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
Challenge Process to Competitive Coverage	)	
in the Alternative Connect America Cost	)	
Model (A-CAM)	)	
	)	

**COMMENTS  
OF  
NEMONT TELEPHONE COOPERATIVE INC.**

Nemont Telephone Cooperative Inc. (Nemont) hereby submits the following challenge regarding certain census blocks in its study areas in Montana (SAC 482287) and North Dakota (SAC 382247) being designated as “wired-served” in v2.2 of the Alternative Connect America Cost Model (A-CAM). A review of the June 30, 2015 FCC Form 477 data identified providers which may have led to the “served” designation. Immediately below are the census blocks for which Nemont seeks to contest the existence of a qualifying competitor, organized by study area and by the competitors identified in Form 477 data as serving in the block. Following the list of census blocks is a narrative on each of the competitors demonstrating how they fail to offer service meeting all of the requisite requirements in the blocks being challenged.

Census Blocks (SAC 482287)	Competitor Identified in FCC Form 477
300710602003452	Central Montana Communications, Inc.
300710602004778	Central Montana Communications, Inc.
300710602004784	Central Montana Communications, Inc.
300710602004785	Central Montana Communications, Inc.
300710602004787	Central Montana Communications, Inc.
300710602004789	Central Montana Communications, Inc.
300710602004804	Central Montana Communications, Inc.
300710602004806	Central Montana Communications, Inc.

Census Blocks (SAC 382247)	Competitor Identified in FCC Form 477
381059535002134	Northwest Communications Cooperative, Inc.
381059535002138	Northwest Communications Cooperative, Inc.
381059535002155	Northwest Communications Cooperative, Inc.
381059536001703	Northwest Communications Cooperative, Inc.
381059536001708	Northwest Communications Cooperative, Inc.
381059536001723	Northwest Communications Cooperative, Inc.
381059536001732	Northwest Communications Cooperative, Inc.
380539625001170	Reservation Telephone Cooperative

Central Montana Communications, Inc. (Triangle Telephone)

Central Montana Communications is a rate-of-return ILEC whose study area is adjacent to Nemont’s study area in Montana. Central Montana Communications does not offer any services anywhere in Nemont’s study area. The census blocks ending in 3482 and 4788 are “split” blocks that contain part of each company’s study area. The other contested census blocks are near Nemont’s study area boundary but entirely contained within Nemont’s study area. “Attachment A” of this filing shows the locations of the contested census blocks. Central Montana Communications does not offer any services to any locations in the split blocks that reside within Nemont’s study area, nor do they offer any services in the contested census blocks that are entirely contained within Nemont’s study area.

Northwest Communications Cooperative, Inc.

Northwest Communications Cooperative is a rate-of-return ILEC whose study area is adjacent to Nemont’s study area in North Dakota. Northwest Communications Cooperative does not offer any services anywhere in Nemont’s study area. The contested census blocks are near Nemont’s study area boundary but entirely contained within Nemont’s study area. “Attachment B”, items B through H, shows the locations of the contested census blocks. Northwest Communications Cooperative does not offer any services in the contested census blocks.

Reservation Telephone Cooperative

Reservation Telephone Cooperative is a rate-of-return ILEC whose study area is adjacent to Nemont's study area in North Dakota. Reservation Telephone Cooperative does not offer any services anywhere in Nemont's study area. The contested census block is near Nemont's study area boundary but entirely contained within Nemont's study area. "Attachment B", item A, shows the location of the contested census block. Reservation Telephone Cooperative does not offer any services in the contested census block.

Respectfully submitted,

/s/ Remi Sun

Remi Sun

Chief Financial Officer

**Nemont Telephone Cooperative Inc.**

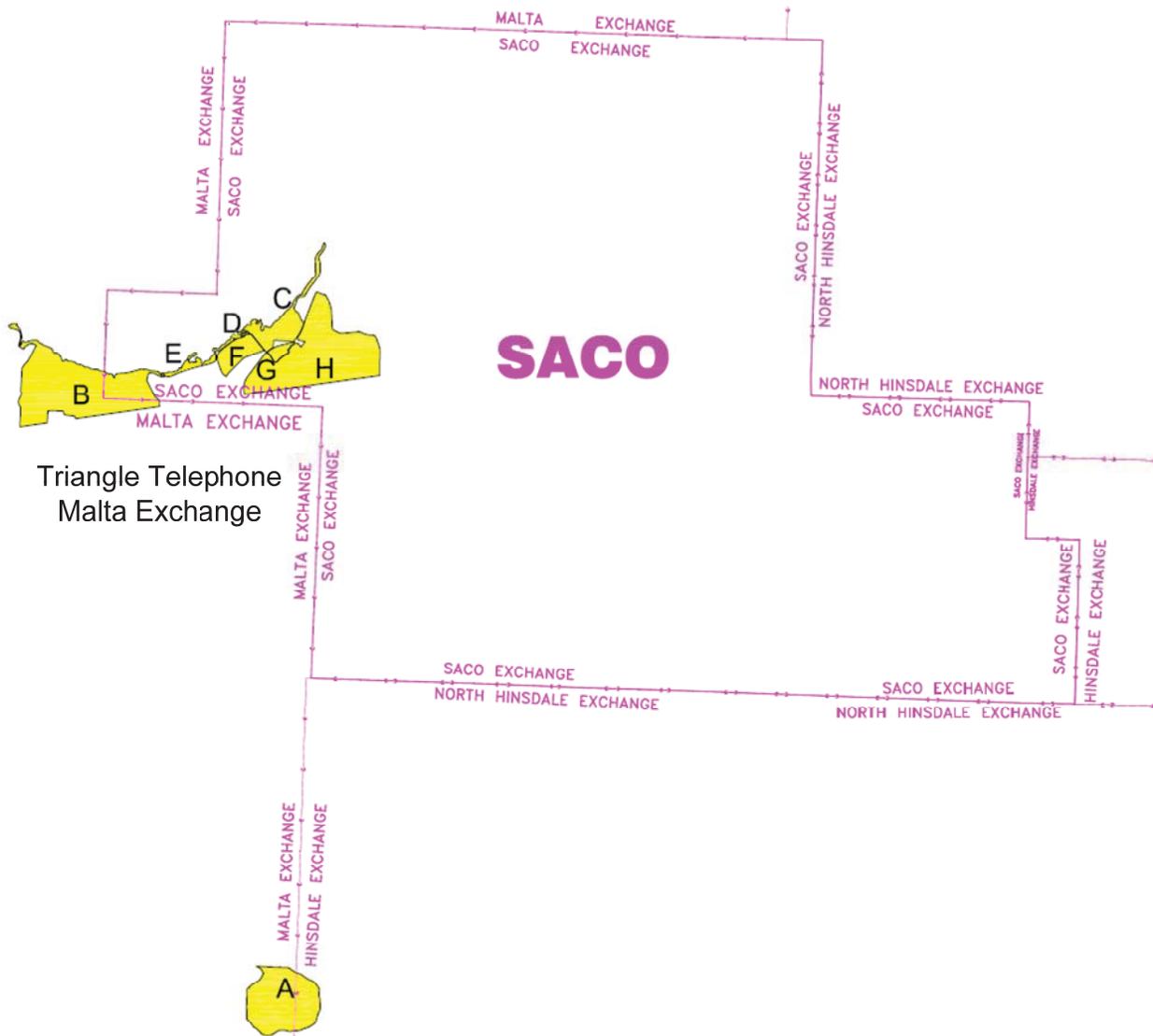
P.O. Box 600

61 Highway 13 S.

Scobey, MT 59263

(800) 636-6680

## Nemont Telephone Cooperative Montana - Saco and North Hinsdale Exchanges



A – 300710602003452

B – 300710602004778

C – 300710602004784

D – 300710602004785

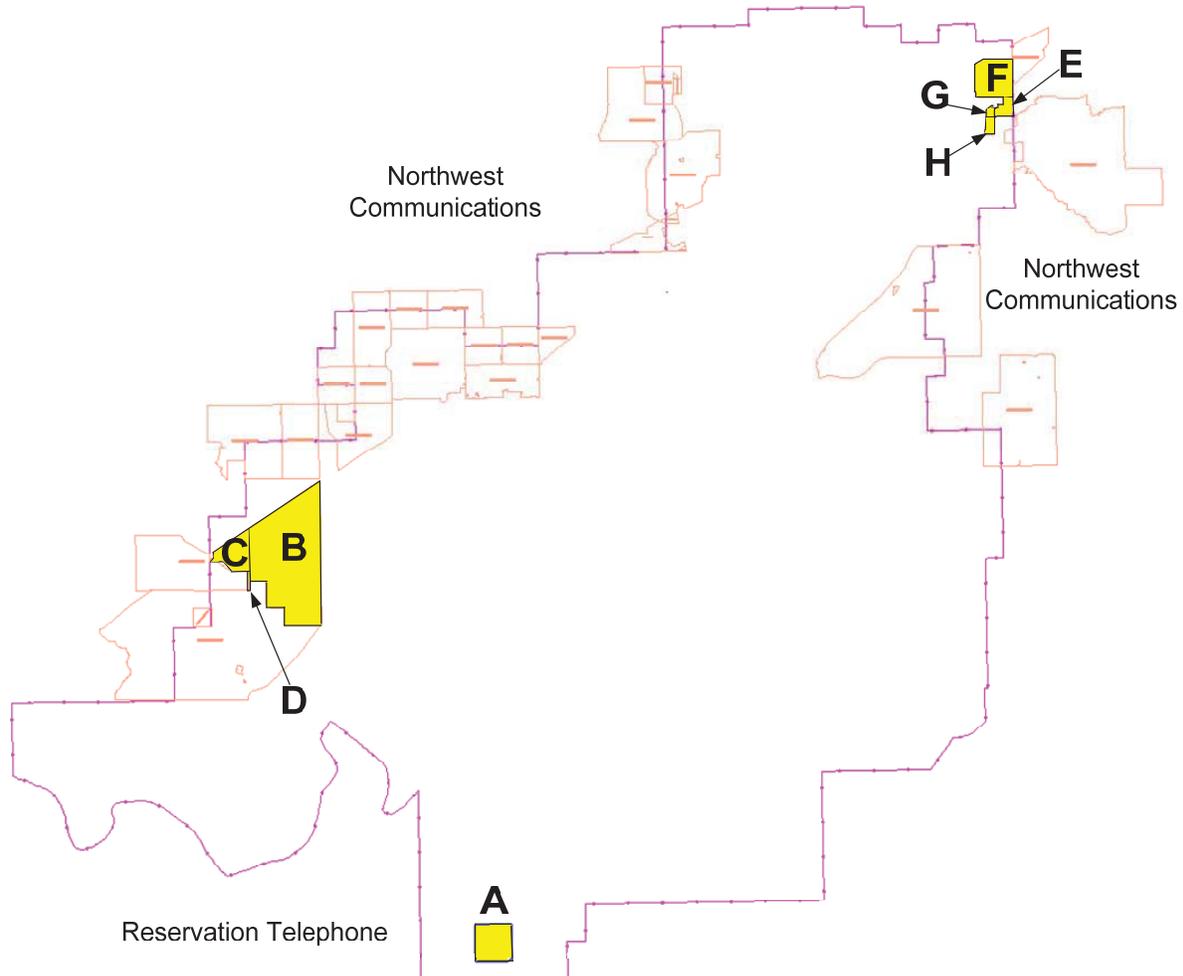
E – 300710602004787

F – 300710602004789

G – 300710602004806

H – 300710602004804

# Nemont Telephone, Missouri Valley Communications North Dakota, Williston Exchange



A – 380539625001170

B – 381059535002134

C – 381059535002138

D – 381059535002155

E – 381059536001703

F – 381059536001708

G – 381059536001723

H – 381059536001732