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April 28, 2016

**VIA E-FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Room TW-A325  
Washington, DC 20554

Re: WC Docket No. 10-90 - Comments of Oregon-Idaho Utilities, Inc., d/b/a  
Humboldt Telephone Company

Dear Ms. Dortch:

I represent Oregon-Idaho Utilities, Inc., d/b/a Humboldt Telephone Company. For purposes of this challenge, Humboldt Telephone Company has study area code 553304 and provides voice and broadband service to parts of Humboldt and Elko counties in Northern Nevada.

This challenge is under the challenge process set out in DA 16-378 and concerns census block 320130105001726 (the "Census Block"). According to the FCC Form 477 information for purposes of the Alternative Connect America Cost Model (A-CAM), the Census Block is also served by CalNeva Broadband, LLC. CalNeva Broadband, LLC is a cable company serving Winnemucca, Nevada. The Census Block is northwest of Paradise Valley, Nevada. Paradise Valley is about thirty miles northwest of Winnemucca, Nevada.

Attached as Exhibit 1 is the Declaration of Douglas N. Musgrave, Operations Manger of Humboldt Telephone Company. Based on both personal knowledge of the area and discussions with CalNeva Broadband's representatives, the Census Block is, in fact, not served by CalNeva Broadband. The service representative for CalNeva Broadband stated that CalNeva Broadband does not provide service in or around Paradise Valley. As set out in Exhibit 1, Mr. Musgrave provided an address within the Census Block to the customer service representative and the person confirmed that CalNeva Broadband could not serve that address.

In addition, the information from the customer service representative was later confirmed by a conversation between Mr. Musgrave and Mr. Gillardi (phonetically spelled) who identified

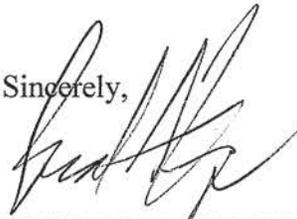
Marlene H. Dortch  
April 28, 2016  
Page 2 of 2

himself as the owner of CalNeva Broadband. Mr. Gillardi told Mr. Musgrave that his company did not serve Paradise Valley and only served the area in the vicinity of Winnemucca, Nevada.

Based on this information, Humboldt Telephone Company respectfully requests that the final version of the A-CAM be modified to reflect that there is no unsubsidized competitor in the Census Block.

Thank you for your attention to this challenge.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Finnigan', written over a light grey background.

RICHARD A. FINNIGAN

RAF/cs  
Enclosure

cc: Client (via e-mail)