



Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

April 28, 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
Alma Telephone Company
Challenge to A-CAM V2.2 Competitive Coverage**

Dear Ms. Dortch:

On behalf of Alma Telephone Company (“ATC”), JSI files the attached ATC 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”).

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	WC Docket No. 10-90
Connect America Fund)	

A-CAM COMPETITIVE CHALLENGE

**COMMENTS OF ALMA TELEPHONE COMPANY
CHALLENGING A-CAM COMPETITORS PURSUANT TO PUBLIC NOTICE**

Alma Telephone Company (“ATC” or the “Company”) hereby submits these comments regarding the Federal Communications Commission’s (“FCC” or “Commission”) April 7, 2016 Public Notice which published the preliminary determination of unsubsidized competitive coverage for rate-of-return Incumbent Local Exchange Carrier (“ILEC”) study areas.¹

Pursuant to the *Public Notice* and paragraph 71 the Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking released on March 30, 2016 in the above-reference proceedings by the Federal Communications Commission (“FCC” or “Commission”),² ATC hereby challenges the competitive coverage in certain census blocks contained in the latest version of the A-CAM model (ver. 2.2).

I. BACKGROUND

ATC is an ILEC serving rural customers in Georgia. The Company’s Study Area Code (“SAC”) is 4334934. As further outlined below, the Company maintains that the latest version of the A-CAM contains errors that are impacting the total number of locations eligible for support by excluding census blocks where Form 477 data erroneously indicates the presence of unsubsidized

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*”).

² See *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Order, FCC 16-33 (rel. Mar. 30, 2016) (“*USF Reform Order*”).

competitive providers. These errors in the A-CAM model significantly reduces ATC's potential model-based support.

Through this petition, ATC 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 ATC 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 ATC'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 provider does not offer broadband service in three census blocks within the Company's study area.

a. Vyve Broadband A, LLC

According to the A-CAM, Vyve Broadband A, LLC ("Vyve") offers cable modem services (technology code 42) in census blocks 130059702011189, 130690103001116, and 130690103002069 in ATC's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Vyve (data as of June 30, 2015). ATC has investigated Vyve's service availability in these census blocks which ATC did not believe that the competitor provided service, and found that Vyve does not offer any broadband service in these blocks. These blocks are isolated blocks that are not adjacent to any other blocks where Vyve provides service. ATC representatives drove all roads and visited all locations in these blocks and could not locate any Vyve subscriber plant facilities (see Attachment A, Declaration of ATC's VP Network Engineering). Accordingly, Vyve erroneously reported these block as ones in which it offers

³ *USF Reform Order* at footnote 31.

broadband service and, in the next release of the A-CAM, these blocks should be not be shown as ones in which Vyve offers service as an unsubsidized competitor.

III. CONCLUSION

For the reasons stated above, ATC 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 ATC 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/ Kevin Brooks
President
Alma Telephone Company

Filed April 28, 2016

Attachment

DECLARATION OF GERRY GRAYSON

I, Gerry Grayson, am VP Network Engineering of Alma Telephone Company (“ATC” or the “Company”). I have personal and direct knowledge of the representations made by ATC in its April 27th, 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 Vyve Broadband, LLC does not provide 10/1 Mbps broadband service as an unsubsidized competitor in certain census blocks in ATC’s incumbent telephone service area. I verify that employees of the Company have investigated all service locations in the census blocks identified in this challenge, and there is no evidence of service by Vyve Broadband.

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

Executed on April 27, 2016

A handwritten signature in blue ink that reads "Gerry Grayson". The signature is written in a cursive style and is positioned above the printed name and title.

Gerry Grayson, VP Network Engineering
Alma Telephone Company