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April 28, 2016

**Via ECFS**

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  
Shoreham Telephone Company  
Challenge to A-CAM V2.2 Competitive Coverage**

Dear Ms. Dortch:

On behalf of Shoreham Telephone Company (“Shoreham”), JSI files the attached Shoreham 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>

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)

Attachment

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<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”).

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 SHOREHAM TELEPHONE COMPANY  
CHALLENGING A-CAM COMPETITORS PURSUANT TO PUBLIC NOTICE**

Shoreham Telephone Company (“Shoreham” 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.<sup>1</sup>

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”),<sup>2</sup> Shoreham hereby challenges the competitive coverage determination in certain census blocks contained in the latest version of the A-CAM model (ver. 2.2).

**I. BACKGROUND**

Shoreham, an Otelco company, is an ILEC in rural Vermont. The Company’s Study Area Code (“SAC”) is 140064. 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 competitive providers. These errors in the A-CAM model reduces Shoreham’s potential model-based support.

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

Through this petition, Shoreham 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 Shoreham 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 Shoreham's study area in the latest A-CAM, the Company submits challenges to the following providers based primarily on grounds that these "competitors" are actually neighboring ILECs who do not provide any voice or broadband service within Shoreham's study area. The census blocks listed below are **not** "split blocks"; these blocks are located entirely within Shoreham's study area and are listed as competitive due to inadvertent errors on the neighboring ILEC's June 2015 Form 477 data.

### **a. Waitsfield-Fayston Telephone Company**

According to the A-CAM, Waitsfield-Fayston Telephone Company (SAC 140069) offers DSL services (technology codes 11 and 12) in census block 500019609003093 in Shoreham's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Waitsfield-Fayston (data as of June 30, 2015). As demonstrated in Attachment A, Waitsfield-Fayston does not offer any broadband service in this block in Shoreham's study area. As Waitsfield-Fayston explains, the company inadvertently incorrectly reported this block as one in which it offers broadband service and, in the next release of the A-CAM, this block should be not be shown as one in which Waitsfield-Fayston offers service as an unsubsidized competitor.

### **b. Telephone Operating Company of Vermont, LLC, dba FairPoint Communications**

According to the A-CAM, Telephone Operating Company of Vermont, LLC, dba FairPoint Communications ("FairPoint") offers DSL services (technology code 11) in census blocks 500219623003025, 500219623003058, 500219623002043, and 500219623002013

in Shoreham's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by FairPoint (data as of June 30, 2015). As demonstrated in Attachment B, FairPoint does not offer any broadband service in this block in Shoreham's study area. As FairPoint explains, the company inadvertently incorrectly reported these blocks as those in which it offers broadband service. Accordingly, in the next release of the A-CAM, these blocks should be not be shown as ones in which FairPoint offers service as an unsubsidized competitor.

### III. CONCLUSION

For the reasons stated above, Shoreham 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 Shoreman 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/ Ed Tisdale  
Senior Vice President and  
General Manager- Northeast Operations  
OTT Communications

Filed April 28, 2016

Attachments



**Filed via ECFS**

April 26, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554  
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Waitsfield-Fayston Telephone Company, Inc. (“Waitsfield-Fayston” or the “Company”), Study Area Code 140069, hereby notifies the Federal Communications Commission (“FCC” or “Commission”) and the Wireline Competition Bureau of changes that it will be making to its June 2015 FCC Form 477 data. The changes described herein were discovered when Shoreham Telephone Company, LLC (“Shoreham”), Study Area Code 140064, identified that one census block in Shoreham’s study area was “knocked out” of the Alternative Connect America Model (“A-CAM”) due to an alleged competitive overlap by Waitsfield-Fayston.

Waitsfield-Fayston’s previously-filed FCC Form 477 containing data as of June 30, 2015 had incorrectly identified one census block that is *entirely* within Shoreham’s boundaries. Waitsfield-Fayston does not, in fact, provide voice and broadband as an unsubsidized competitor to any census blocks or locations within Shoreham’s study area. The addition of this block in Waitsfield-Fayston’s Form 477 was an inadvertent error that came to light when Shoreham conducted an in-depth review of the A-CAM and the FCC’s challenge process to allow competitive providers to file revised Form 477 data by April 28, 2016.<sup>1</sup>

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<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*”).

Marlene H. Dortch, Secretary  
Federal Communications Commission  
April 26, 2016  
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Waitsfield-Fayston respectfully requests that the FCC allow this correction to be included in the forthcoming final version of the A-CAM to reflect accurately these facts. Without this correction, the Commission's universal service policy for Shoreham will be frustrated as the amount of support available will not be sufficient to advance broadband technology in the area.

With this letter, Waitsfield-Fayston verifies that it does not provide voice and 10/1 Mbps broadband to the census block listed below.

Sincerely,

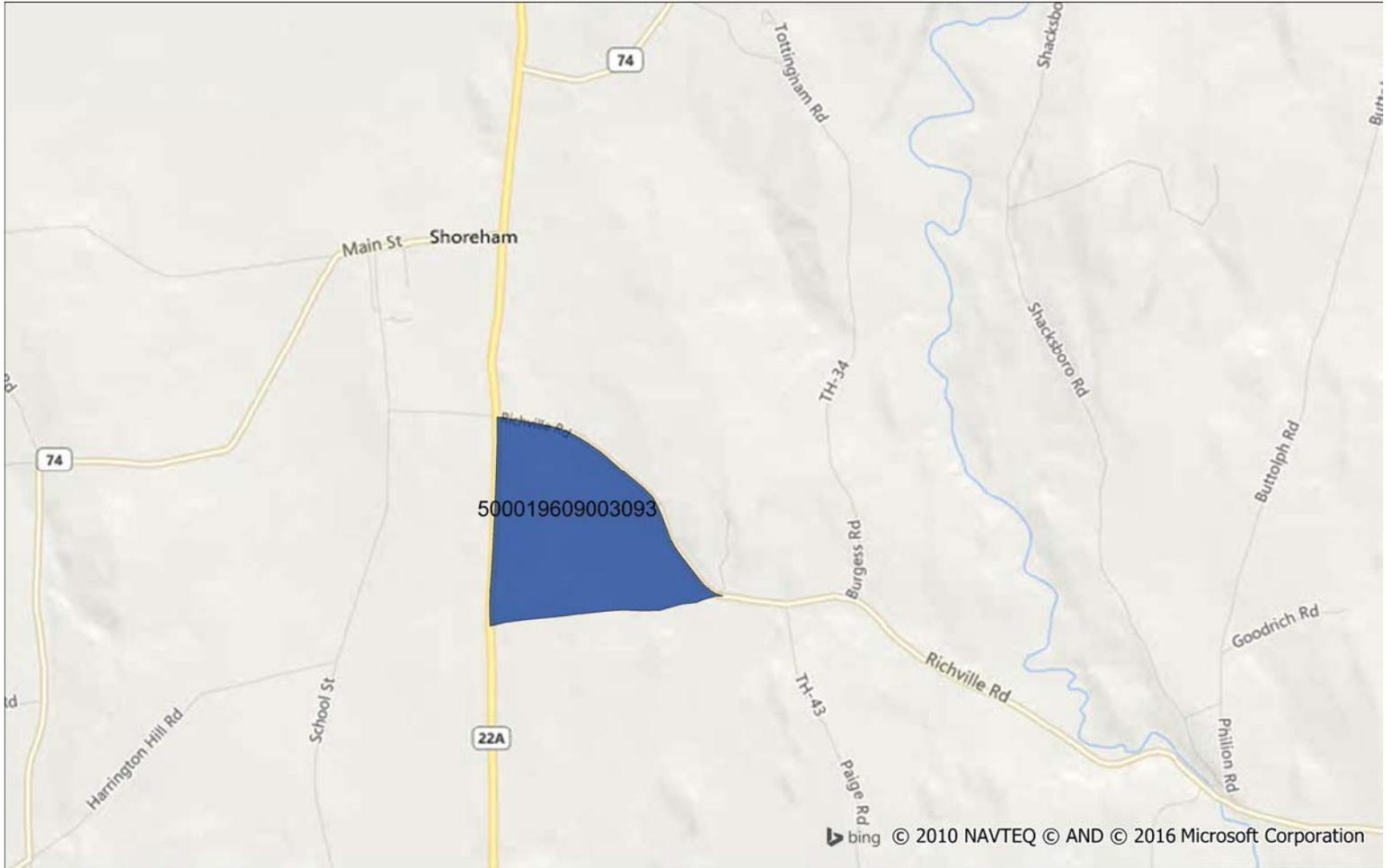


Roger Nishi  
Vice President – Industry Relations

cc: Katie King, Telecommunications Access Policy Division

**Census Blocks Entirely Within Shoreham's Study Area**

**500019609003093**





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**Filed via ECFS**

April 28, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554  
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Telephone Operating Company of Vermont LLC, dba FairPoint Communications (“FairPoint” or the “Company”), Study Area Code 145115, hereby notifies the Federal Communications Commission (“FCC” or “Commission”) and the Wireline Competition Bureau (“WCB” or “Bureau”) of errors the that the Company identified to its June 2015 FCC Form 477. The errors described herein were discovered when Shoreham Telephone Company, LLC (“Shoreham”), Study Area Code 140064, notified the Company that several census blocks in Shoreham’s study area were “knocked out” of the Alternative Connect America Model (“A-CAM”) due to an alleged competitive overlap by FairPoint.

FairPoint’s previously-filed FCC Form 477 containing data as of June 30, 2015 had incorrectly identified 4 census blocks that are *entirely* within Shoreham’s boundaries. The addition of these blocks in FairPoint’s Form 477 was an inadvertent error that came to light when Shoreham contacted FairPoint about its in-depth review of the A-CAM and the FCC’s challenge process to allow competitive providers to file revised Form 477 data by April 28, 2016. FairPoint is revising its procedures to ensure that its 477 filings identify served locations within its served Census Blocks.

With this letter, FairPoint verifies that it does not provide voice and 10/1 Mbps broadband to the census blocks listed below.

Sincerely,

  
Michael T. Skrivan  
VP Regulatory, FairPoint Communications

cc: Katie King, Telecommunications Access Policy Division

**Census Blocks Entirely Within Shoreham’s Study Area**

500219623003025  
500219623003058  
500219623002043  
500219623002013