

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
Rockwell Cooperative Telephone Association
Challenge to Competitive Coverage of Skybeam Acquisition Corp. d/b/a Prairieinet
and LTD Broadband LLC**

Dear Ms. Dortch:

On behalf of Rockwell Cooperative Telephone Association, Olsen Thielen files the attached challenge to the competitive coverage data set forth in the Alternative Connect America Cost Model (A-CAM) version 2.2 released by the Wireline Competition Bureau on April 7, 2016.

Kindly direct any questions regarding this filing to my attention.

Sincerely,

Pamela L. Hintz



Senior Telecommunications Consultant at
Olsen Thielen

cc: LTD Broadband
Sunbeam Acquisition Corp.

Alternative Connect America Cost Model Challenge (A-CAM) Process

OMB Control Number 3060-1188

FCC Form 505

Filing Entity:	Rockwell Cooperative Telephone Association
FRN (if applicable):	0003-7419-64
Name of Person Filling Out Form:	Pamela L. Hintz
Mailing Address of Person Filling out Form:	2675 Long Lake Road, St. Paul, MN 55113
Email Address of Person Filling out Form:	phintz@otcpas.com
Phone Number of Person Filling out Form:	(651) 621-8538
Name of Person Certifying Data within Form:	David L. Severin
Mailing Address of Person Certifying Data within Form:	111 North Fourth Street, Rockwell, IA 50469-0416
Email Address of Person Certifying Data within Form:	Rockwell@netins.net
Phone Number of Person Certifying Data within Form:	(641) 822-3211

190693601001012	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001014	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001016	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001018	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001019	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001023	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001024	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001026	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001044	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001045	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001046	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001156	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001161	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001162	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B
190693601001163	IA	Skybeam Acquisition Corp. d/b/a Prairieinet					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit B

<u>Accuracy and Due Diligence Certification</u>	
<i>All Filers Must Fill Out</i>	
By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.	
Certifier's Initials:	<i>J.S.S.</i>
Date:	<i>4/27/16</i>
	<i>Donald Jensen</i>

<u>Notice of Challenge Certification</u>	
<i>(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)</i>	
Service of Notice Successful	
By initialing below, I certify that notice of this challenge has been served on all interested parties.	
Certifier's Initials:	<i>J.S.S.</i>
Date:	<i>4/27/16</i>
	<i>Donald Jensen</i>
Service of Notice Unsuccessful	
By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.	
Name of Party/Parties that Could Not Be Served:	
Certifier's Initials:	
Date:	

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

Form 505 - Exhibit A

WC Docket – 10-90, Alternative Connect America Cost Model (A-CAM) Challenge

LTD Broadband in Iowa:

Per the National Broadband Map, LTD Broadband LLC (“LTD”) claims to offer voice service in 414 Census Blocks in Rockwell's Serving Area. Rockwell hereby challenges such claims with respect to all 414 Census Blocks. Based on information provided in Attachment A, which was retrieved from LTD's website, “LTD Broadband provides high speed fixed-wireless internet service in southern Minnesota and northern Iowa.” (<http://ltdbroadband.com/index.html>). Further, there is no evidence in the Local Exchange Routing Guide (“LERG”) that LTD has secured numbering assignments from NANPA or evidence on the Iowa Utilities Board website that LTD has executed an interconnection agreement with any local exchange company within the State of Iowa.

Based on the evidence provided herein, Rockwell challenges the competitive presence of LTD Broadband in the Census Blocks listed on Form 505.



507-369-6669

[PLANS](#)[SITE SURVEY](#)[ABOUT US](#)[CONTACT US](#)

Why choose LTD Broadband?

1. Fast speeds
2. Great pricing - as low as \$30/mo
3. Reliable network
4. Amazing tech support - local techs
5. Unlimited service - no download caps

LTD Broadband was founded with the goal of providing rural areas with reliable, inexpensive high speed internet with no bandwidth caps and no long term contracts.

We have helped hundreds of customers upgrade from Clearwave, Wild Blue, Hughesnet, phone company DSL, cell phone company hot spots and dialup.

LTD Broadband opened for business in 2011 with one tower Rose Creek, MN. Now LTD Broadband has over 100 towers in southern Minnesota and northern Iowa.

Get in Touch

LTD Broadband

Phone: **507-369-6669**Email: ltdbroadband@gmail.com



507-369-6669



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LTD Broadband

Phone: **507-369-6669**

Email: ltdbroadband@gmail.com

Pricing:

3 mbps download / 0.5 mbps upload

\$105 for 3 months (works out to \$35/mo)

\$198 for 6 months (works out to \$33/mo)

\$360 for 12 months (works out to \$30/mo)

6 mbps download / 1 meg upload

\$165 for 3 months (works out to \$55/mo)

\$318 for 6 months (works out to \$53/mo)

\$600 for 12 months (works out to \$50/mo)

10 mbps download / 2 meg upload

\$225 for 3 months (works out to \$75/mo)

\$438 for 6 months (works out to \$73/mo)

\$840 for 12 months (works out to \$70/mo)

Form 505 - Exhibit B

WC Docket – 10-90, Alternative Connect America Cost Model (A-CAM) Challenge

Skybeam Acquisition Corp. in Iowa:

Per the National Broadband Map, Skybeam Acquisition Corp., operating under the trade name Prairieinet¹, (“Skybeam”) claims to offer voice service in 323 Census Blocks in Rockwell's Serving Area. Rockwell hereby challenges such claims with respect to all 323 Census Blocks. As supported by Attachment A, according to the website of Rise Broadband², Skybeam’s parent company, the Rise Broadband family of companies’ local phone service “includes 911 services and free porting, so you can keep your existing phone number”³ As such, it would be expected that Skybeam would have the capability to port local numbers within the Rockwell’s Study Area. However, to date, as a rural ILEC, Rockwell has yet to receive a single port order for any of its local exchange customers from Skybeam or any other competitive provider.

Based on the evidence provided herein, Rockwell challenges the competitive presence of Skybeam Acquisition Corp. in the Census Blocks listed on Form 505.

¹ As of May 15, 2016, Rise Broadband will be the new name for Jab Broadband pursuant to information appearing on its Website

² See Statement of Paul Lambert filed by JAB Wireless with the FCC in WC 14-93 on November 10, 2014

³ Retrieved from <http://risebroadband.com/residential>

High Speed Internet
Voice
PC Support



844-411-RISE (tel:844-411-RISE)

(<http://risebroadband.com/>)

Account (<http://risebroadband.com/my-account/>)

Pay My Bill
(<https://jabwi.convergentcare.com/jabwi/goToLogin.action?subClientId=3902#Application/onReady>)



Residential High-Speed Internet

Rise Broadband provides high-speed Internet and digital phone service in 16 states in the Midwest, Rocky Mountain and Southwest regions.

Whether you live in a suburban or rural area, Rise helps keep you and your family connected with the people and things you value most.

Feel Free to enjoy lightning-fast downloads and quick access to information, entertainment, education and streaming video. Take advantage of our PC Care and Device Connection/Managed Router services to free up your time and help ensure your Internet connection is running at peak performance.

Check availability now!

Enter your service address in the form on the right.

Or to sign up for service, call 1-844-411-RISE (844-411-7473).

[Click here to learn more about Digital Phone.](#)

[Click here to learn more about PC Care.](#)

Digital Phone (ActivePhone™)



ActivePhone™ gives you the power to connect AND save. It provides the features of traditional residential phone service plus all of the latest features you need to be more productive.

Add ActivePhone™ for \$9.95 a month with a 2-year wireless Internet service agreement or \$19.95 without a 2-year agreement.

Save money on your mobile phone service with ActivePhone™:



Check service availability.

Home Business

ADDRESS	
CITY	STATE <input type="text"/>
ZIP	

SEE OFFERS



- **Unlimited Domestic Long Distance** – Call anywhere in the U.S. at no additional cost. Save your mobile plan minutes for when you really need them
- **Free International Long Distance** – Call to landlines in 64 countries and mobile phones in 13 countries at no additional cost*
- **Free Multi-Ring** – Rings the phones in your home as well as your mobile device with a single phone number, allowing you to reduce mobile minute usage when you are home
- **ActivePhone™ Messaging** – Automatically have your voicemail messages delivered to you via email, or set the service to notify you of new voicemail messages via text message so you can choose how and when to respond to messages
- **Web-Based Administration Tools** – View your past calls, find a lost phone number, and configure your service options to meet your specific needs
- ActivePhone™ also comes with many standard phone features including **call waiting, caller ID with name, 3-way calling, last call return and auto redial**
- **Active Phone™ includes 911 services and free number porting, so you can keep your existing phone number***



PC Care Service Plan

The PC Care Service Plan provides support and coverage for your PC. For only \$8.99 a month, Rise Broadband will:

- Identify and fix hardware/software errors
- Identify and assist with networking issues
- Supply standard replacement parts and in-home labor to repair one covered device as often as needed, not to exceed \$500 per year per covered device.

Support for additional PCs can be added for \$6.50 each per month.

Premium Technical Support Service Plan 

The Premium Technical Support Service Plan provides all of the support and coverage included in the PC Care Service Plan, plus the following expanded services for only \$14.99 a month:

- Operating systems upgrade/update support** (Windows PC, Mac OSX)
- Content backup/sharing support**: e.g. iCloud, Google Drive, DropBox
- Computer tune-up and maintenance of PC and Mac devices
- 3rd party devices: printers, scanners, copiers, fax machines, external hard drives, etc.
- Mobile devices (including tablets): setup and trouble-shooting
- TV and video support: Internet/smart TV, Blu-Ray, DVD, game console

Compare PC Care to Premium Technical Support

Services Included:	PC Care	Premium Technical Support
	\$8.99	\$14.99
Configuration troubleshooting	√	√
Evaluating and attempting to correct software	√	√
Assist with operating systems and networking issues	√	√
Virus/spyware detection and removal	-	√
Software and peripherals support for network, video/sound cards, memory, hard drives, CD/DVD reader/writers, printers and scanners	-	√
Assist with home networking equipment	-	√
Computer tune-ups and maintenance (PCs and Macs)	-	√



Troubleshooting and wireless support connecting TVs, Blu-Rays, tablets and mobile devices	-	√
Content Sharing**: transfer of content from one device to another	-	√
Online safety and security support**: Internet security, storage and backup, etc.	-	√
Support, configuration, setup and troubleshooting of 3rd party devices: printers, scanners, copiers, fax machines, external hard drives, etc.	-	√
Mobile Devices (including tablets): setup and trouble-shooting	-	√
TV and Video Support: Internet/smart TV, Blu-Ray, DVD, game console	-	√

A-La-Carte PC Care Options

Don't need a monthly service plan? We can still help fix your device with several "pay-as-you-go" options below:

PC Maintenance (\$50 each occurrence): Includes a Windows Disk cleanup, enabling Windows Updates and activating Windows Firewall.

Device Setup (\$75 each occurrence): Includes printer, camera and MP3 player setup, configuration and trouble shooting.

PC Tune-up (\$125 each occurrence): Includes diagnosing a PC infected with spyware, malware and viruses; helping you to select, purchase and install an internet Security Suite or one of our licensed tools; then scanning and removal of any detected spyware/malware/viruses.

* Rise Broadband ActivePhone™ requires a Rise Broadband Internet connection. 911 service operates based on registered address. Unlimited long distance calling is for calls made to landlines and mobile phones in the USA. Free international calling is for up to 300 minutes of calls made per line (ActivePhone™ and ActivePhone for Business™) or concurrent call session (Enterprise Cloud PBX™) to landlines in these 64 countries: Andorra, Argentina, Australia, Austria, Bahrain, Belgium, Brazil, Brunei, Bulgaria, Canada, Chile, China, Colombia, Croatia, Cyprus, Czech Republic, Denmark, Dominican Republic, Estonia, Finland, France, Georgia, Germany, Greece, Guadeloupe, Guam, Hong Kong, Hungary, Iceland, India, Indonesia, Iraq, Ireland, Israel, Italy, Japan, Latvia, Luxembourg, Macau, Malaysia, Malta, Mexico, Monaco, Netherlands, New Zealand, Norway, Panama, Peru, Poland, Portugal, Puerto Rico, Romania, Russia, Saipan, San Marino, Singapore, Slovakia, Slovenia, South Africa, South Korea, Spain, Sweden, Switzerland, and mobile phones in these 13 countries: Brunei, Canada, China, Guam, Hong Kong, India, Macau, Malaysia, Puerto Rico, Saipan, San Marino, Singapore, South Korea. Alarms, fax, satellite TV and other systems may not be compatible. Rates exclude equipment rental of \$1 to \$6 per line or extension per month, taxes, and fees. Regular number porting, where available, averages 20-30 days. Service not available in all areas.

**This service includes support for customer-purchased software and file programs. The programs themselves are not included, and will need to be purchased independently.

Rise Broadband

- Residential High-Speed Internet
(<http://risebroadband.com/residential/>)
- Business High-Speed Internet
(<http://risebroadband.com/business/>)
- Contact
(<http://risebroadband.com/contact/>)
- Careers
(<http://risebroadband.com/careers/>)

Information

- About Rise Broadband
(<http://risebroadband.com/about-us/>)
- Broadband Terms
(<http://risebroadband.com/legal/broadband-internet-terms-and-conditions-of-service/>)
- Policies and Agreements
(<http://risebroadband.com/legal/>)

My Account

- My Account
(<http://risebroadband.com/my-account/>)
- Pay My Bill
(<https://jabwi.convergentcare.com/jabwi/goToLogin.action?subClientId=3902#Application/onReady>)

Find Us

-  <https://www.facebook.com/pages/Rise-Broadband/1575004259448064>

