

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 Fort Randall Telephone Company
Challenge to Competitive Coverage of Golden West Tel. Coop. d/b/a Golden West
Telecom and Midstate Communications, Inc.**

Dear Ms. Dortch:

On behalf of Fort Randall Telephone Company, 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: Golden West Telecom
Midstate Communications, Inc.

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

OMB Control Number 3060-1188

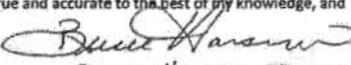
FCC Form 505

Filing Entity:	Fort Randall Telephone Company
FRN (if applicable):	0004-3295-87
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) 621-8535
Name of Person Certifying Data within Form:	Bruce Hanson
Mailing Address of Person Certifying Data within Form:	1700 Technology Drive, Suite 100, Wilmar, MN 56201
Email Address of Person Certifying Data within Form:	bruce@hcinet.net
Phone Number of Person Certifying Data within Form:	(320) 847-2211

Served to Unserved Challenge

Census Block 15 Digit FIPS Code	State	Provider Name as Listed in National Broadband Map	Insert X if Speed Criteria Not Met	Insert X if Usage Allowance Criteria Not Met	Insert X if Latency Criteria Not Met	Insert X if Price Criteria Not Met	Insert X if Voice Criteria Not Met	Type of Supporting Evidence	Additional Comments
460099676001220	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676001244	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002015	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002035	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002037	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002043	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002065	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002072	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002094	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002100	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002101	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676002118	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676003185	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099676003194	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099677001079	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099677001107	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099677001123	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099677001297	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099677001298	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099677001357	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460099677001359	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A

461359664003067	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
461359664003068	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
461359664003077	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
461359664003087	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
461359664003091	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
461359664003099	SD	Golden West Telecommunications					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001054	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001076	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001083	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001126	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001134	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001138	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001155	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402001171	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239402002126	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239403002049	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239403002082	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A
460239403002113	SD	Midstate Communications, Inc.					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit A

<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: <u>BH</u>	
Date: <u>4-28-16</u>	Bruce Hanson, Treasurer

<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: <u>BH</u>	
Date: <u>4-28-16</u>	Bruce Hanson, Treasurer
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.

FCC Form 505 - Exhibit A

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

Golden West Tel. Coop. d/b/a Golden West Telecom in South Dakota:

Per the National Broadband Map, Golden West Telecom (“Golden West”) claims to offer voice service in 55 Census Blocks within Fort Randall’s Study Area. Fort Randall hereby challenges such claims with respect to all 55 Census Blocks. As reflected in the attached screenshots from the Local Exchange Routing Guide (“LERG”) there is no overlap between the two ILEC serving areas.

Based on the evidence provided herein, Fort Randall challenges the competitive presence of Golden West Telecom in the Census Blocks listed on its Form 505.

OCN #	OCN NAME	ABBRE OCN NAME
1659	GOLDEN WEST TEL COOP INC DBA GOLDEN WEST TELECOMM	GOLDEN WEST - COOP
1660	FORT RANDALL TELCO DBA MT RUSHMORE TELEPHONE CO	MT RUSHMORE TEL CO

LATA	LATA NAME	NPA	NXX	OCN	LOC NAME	LOC STATE
640	SOUTH DAKOTA	605	459	1659	ARDMORE	SD
640	SOUTH DAKOTA	605	344	1659	BELVIDERE	SD
640	SOUTH DAKOTA	605	833	1659	BUFFALOGAP	SD
640	SOUTH DAKOTA	605	563	1660	CENTERVL	SD
640	SOUTH DAKOTA	605	457	1659	CREIGHTON	SD
640	SOUTH DAKOTA	605	662	1659	EDGEMONT	SD
640	SOUTH DAKOTA	605	985	1659	ENNING	SD
640	SOUTH DAKOTA	605	739	1659	FAITH	SD
640	SOUTH DAKOTA	605	567	1659	HAYES	SD
640	SOUTH DAKOTA	605	255	1660	HERMOSA	SD
640	SOUTH DAKOTA	605	745	1659	HOTSPRINGS	SD
640	SOUTH DAKOTA	605	433	1659	INTERIOR	SD
640	SOUTH DAKOTA	605	666	1660	KEYSTONE	SD
640	SOUTH DAKOTA	605	455	1659	KYLE	SD
640	SOUTH DAKOTA	605	487	1660	LAKE ANDES	SD
640	SOUTH DAKOTA	605	462	1659	LONGVALLEY	SD
640	SOUTH DAKOTA	605	685	1659	MARTIN	SD
640	SOUTH DAKOTA	605	748	1659	MAURINE	SD
640	SOUTH DAKOTA	605	843	1659	MIDLAND	SD
640	SOUTH DAKOTA	605	544	1659	MILESVILLE	SD
640	SOUTH DAKOTA	605	754	1659	NEWUNDERWD	SD
640	SOUTH DAKOTA	605	535	1659	OELRICHS	SD
640	SOUTH DAKOTA	605	424	1659	ORAL	SD
640	SOUTH DAKOTA	605	859	1659	PHILIP	SD
640	SOUTH DAKOTA	605	867	1659	PINE RIDGE	SD
640	SOUTH DAKOTA	605	386	1659	QUINN	SD
640	SOUTH DAKOTA	308	453	1659	SO ARDMORE	NE
640	SOUTH DAKOTA	308	525	1659	SOOELRICHS	NE
640	SOUTH DAKOTA	605	463	1660	TABOR	SD
640	SOUTH DAKOTA	605	589	1660	TYNDALL	SD
640	SOUTH DAKOTA	605	326	1660	VIBORG	SD
640	SOUTH DAKOTA	307	663	1659	W EDGEMONT	WY
640	SOUTH DAKOTA	605	384	1660	WAGNER	SD
640	SOUTH DAKOTA	605	279	1659	WALL	SD
640	SOUTH DAKOTA	605	993	1659	WASTA	SD
640	SOUTH DAKOTA	308	862	1659	WHITECLAY	NE
640	SOUTH DAKOTA	605	259	1659	WHITERIVER	SD
640	SOUTH DAKOTA	605	798	1659	WICKSVILLE	SD
640	SOUTH DAKOTA	605	452	1659	WOOD	SD

FCC Form 505 - Exhibit B

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

Midstate Communications, Inc. in South Dakota:

Per the National Broadband Map, Midstate Communications (“Midstate”) claims to offer voice service in 12 Census Blocks within Fort Randall’s Study Area. Fort Randall hereby challenges such claims with respect to all 12 Census Blocks. As reflected in the attached screenshots from the Local Exchange Routing Guide (“LERG”) there is no overlap between the two ILEC serving areas.

Based on the evidence provided herein, Fort Randall challenges the competitive presence of Midstate Communications in the Census Blocks listed on its Form 505.

OCN #	OCN NAME	ABBRE OCN NAME
1660	FORT RANDALL TELCO DBA MT RUSHMORE TELEPHONE CO	MT RUSHMORE TEL CO
1670	MIDSTATE COMMUNICATIONS, INC.	MIDSTATE COMM INC

LATA	LATA NAME	NPA	NXX	OCN	LOC NAME	LOC STATE
640	SOUTH DAKOTA	605	726	1670	ACADEMY	SD
640	SOUTH DAKOTA	605	563	1660	CENTERVL	SD
640	SOUTH DAKOTA	605	779	1670	DELMONT	SD
640	SOUTH DAKOTA	605	245	1670	FTTHOMPSON	SD
640	SOUTH DAKOTA	605	293	1670	GANNVALLEY	SD
640	SOUTH DAKOTA	605	255	1660	HERMOSA	SD
640	SOUTH DAKOTA	605	666	1660	KEYSTONE	SD
640	SOUTH DAKOTA	605	778	1670	KIMBALL	SD
640	SOUTH DAKOTA	605	487	1660	LAKE ANDES	SD
640	SOUTH DAKOTA	605	243	1670	NEWHOLLAND	SD
640	SOUTH DAKOTA	605	337	1670	PLATTE	SD
640	SOUTH DAKOTA	605	894	1670	PUKWANA	SD
640	SOUTH DAKOTA	605	732	1670	STICKNEY	SD
640	SOUTH DAKOTA	605	463	1660	TABOR	SD
640	SOUTH DAKOTA	605	589	1660	TYNDALL	SD
640	SOUTH DAKOTA	605	326	1660	VIBORG	SD
640	SOUTH DAKOTA	605	384	1660	WAGNER	SD
640	SOUTH DAKOTA	605	249	1670	WHITE LAKE	SD