

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 Starbuck Telephone
Challenge to Competitive Coverage of Charter Communications, Inc. and
Gardonville Cooperative Telephone Association d/b/a Wisper**

Dear Ms. Dortch:

On behalf of Starbuck Telephone, 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: Charter Communications, Inc.
Wisper

Alternative Connect America Cost Model Challenge (A-CAM) Process
OMB Control Number 3060-1188
FCC Form 505

Filing Entity:	Starbuck Telephone
FRN (if applicable):	0004-3296-52
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:	<u>phintz@otcpas.com</u>
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, Wilma, MN 56201
Email Address of Person Certifying Data within Form:	<u>Bruce@hcinet.net</u>
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 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
271219702002000	MN	Charter Communications Inc					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271219702003148	MN	Charter Communications Inc					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271219704001032	MN	Charter Communications Inc					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271219704001034	MN	Charter Communications Inc					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271219704001036	MN	Charter Communications Inc					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271219702001000	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001001	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001003	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001005	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001006	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001007	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001008	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001009	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001010	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001011	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001012	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001014	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001016	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001017	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001018	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001019	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001020	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001021	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001022	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219702001023	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B

271219704001034	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219704001036	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219704001037	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B
271219704001077	MN	Gardonville Coop. Tel. Ass. d/b/a Wisper					X	Analysis of locations shows no competitors	See supporting affidavit filed with FCC Form 505 in Exhibit B

OMB Control Number 3000-108

All Other Matter (SI) Doc.

Business and Real Estate Certification

By initiating below, I certify that all employees covered in the attached business tax and returns filed have been advised of all relevant information regarding these filings.

Certifier's Name: Bruce Hansen

Date: 4-28-16

Bruce Hansen, Treasurer

Notice of Challenge Certification

Consent to Unrecord and Disposed to Record (Challenge) (SI) Doc. of the Following Block: None

By initiating below, I certify that no challenge has been served on all interested parties.

Certifier's Name: Bruce Hansen

Date: 4-28-16

Bruce Hansen, Treasurer

By initiating 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 Name:

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

Charter Communications Inc. in Minnesota:

Per the National Broadband Map, Charter Communications Inc. (“Charter”) claims to offer voice service in 5 Census Blocks in Starbuck’s Serving Area. Starbuck hereby challenges such claims with respect to all 5 Census Blocks. According to the information found in the Local Exchange Routing Guide (LEFG), neither Charter nor any other competitor has not been assigned numbering resources in Starbuck’s study area. Nor does Charter or any other provider order facilities from Starbuck to furnish local phone service.

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

FCC Form 505 - Exhibit B

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

Wisper in Minnesota:

Per the National Broadband Map, Wisper High Speed Internet (Wisper) claims to offer voice service in 220 Census Blocks in Starbuck Telephone's Study Area. Starbuck hereby challenges such claims with respect to all 220 Census Blocks. Based on information provided in Attachment A, neither Wisper nor its ILEC affiliate, Gardonville Telephone, provide service in Starbuck's study area. Rather, as indicated in Attachment B, which was retrieved from http://www.gctel.com/index.php?option=com_content&view=article&id=69&Itemid=971, Wisper's service offering is limited to high speed internet. Starbuck's challenge is further supported by the sworn affidavit of Wisper's General Manager, Dave Wolf, included as Attachment C to this Exhibit.

Based on the evidence provided herein, Starbuck challenges the competitive presence of Wisper in the Census Blocks listed on its Form 505.

Home | Webmail | Spam Filter Login | eBill Login | Phone Directory   

Services News Links Support About Us

GC Voice

- Long Distance
- Toll-Free Calling
- Custom Calling Features
- Bundle Information
- Directory Advertising
- Business Phone Systems
- Call Termination Issues

GC Voice Services

Gardonville provides local and long distance service throughout western Douglas County and eastern Grant County in Minnesota.

If you are located in Garfield, Brandon, Millerville, Leaf Valley, Evansville, Melby, Erdahl or the west side of Alexandria, Gardonville may be your local phone provider. To sign up for local telephone service, **fill out this form** and bring it to the Gardonville office at 800 Central Ave N, Brandon, MN.

Need assistance paying your phone bill?

You may qualify for assistance under a federally funded lifeline program. **Click Here** to see if you qualify and to print the signup form.



Favorites

- Call Before You Dig
- Community Calendar
- The Record
- Newsletter
- DVR On The Go
- WatchTVEverywhere
- Support Little Peeps

Weather

Brandon, MN



Hi 50°F | Lo 34°F

More weather...

Promotions

- Paperless Statement
- Promo
- Free Installation on Internet
- 60 Days Free Digital Television

800 Central Avenue N | Brandon, MN 56315
218 3rd Ave E, Suite 101 | Alexandria, MN 56308

Telephone: (320) 834-5151 or (888) 238-3574
Fax: (320) 524-2765

24x7 Help Desk: (320) 834-5155 or (888) 934-0044
E-mail: gardon@gardonville.net

Gardonville is an equal opportunity provider and employer.



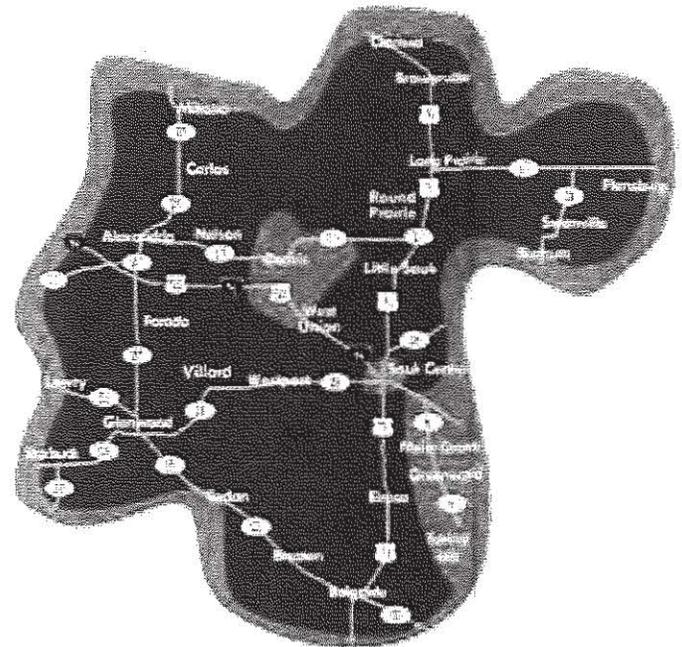
Wisper High Speed Internet by Gardonville offers fast and reliable wireless Internet service throughout parts of Douglas, Pope, Stearns, Todd and Morrison counties.

Call the Team at Gardonville at (888) 236-3574 to ask about speeds and availability in your area. In the meantime, this map should give you a good indication on whether you're able to receive Wisper High Speed at your location!

[Click here for a larger map](#)

PRICING

<u>Speed</u>	<u>Monthly Price</u>
256 K	\$29.95
384 K	\$34.95
512 K	\$36.95
768 K	\$44.95
1 M	\$49.95
1.5 M *	\$54.95



** Some restrictions apply. Please call for availability. Some locations are capable of achieving faster speeds than listed above. Speeds are "up to." Actual speed may vary.*

INSTALLATION PRICING

No Service Agreement	\$99.95
1 Year Service Agreement	\$59.95

OTHER FEES

Modem Rental	\$2.99/Month
Seasonal Disconnect	\$2.99/Month

All High Speed Wireless packages include:

- 5 E-mail addresses (excluding 256 K)
 - 50 MB of E-mail Disk Storage
- FREE Spam & Virus E-Mail Filtering
- FREE 24/7 Technical Support

SWORN AFFIDAVIT OF WISPER

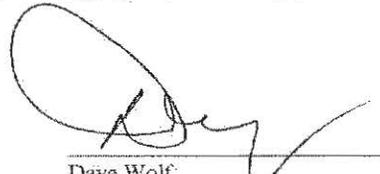
**DECLARATION OF GARDONVILLE COOPERATIVE TELEPHONE ASSOCIATION
DBA WISPER**

I, Dave Wolf state as follows:

1. I am General Manager of Gardonville Cooperative Telephone Association dba Wisper (the "Company"). I have personal and direct knowledge of the Company's service area and its service offerings within neighboring incumbent local exchange carriers ("ILECs"). Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein.
2. The Company does not offer voice service within the study area of Starbuck Telephone Company. The 220 census blocks identified as being served with fixed wireless voice services and broadband speed above 10/1 with Starbuck in version 2.2 of the Alternative Connect America Cost Model ("A-CAM"), in fact, does not constitute an "unsubsidized competitor" in any of the service area served by Starbuck.
3. As a fixed wireless provider the Company does not receive support from the federal universal service fund.

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

Executed on April 27, 2016



Dave Wolf
General Manager
Gardonville Cooperative Telephone
Association dba Wisper