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

Dear Ms. Dortch:

On behalf of Carr Telephone Company (“Carr”), JSI files the attached Carr 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 CARR TELEPHONE COMPANY
CHALLENGING A-CAM COMPETITORS PURSUANT TO PUBLIC NOTICE**

Carr Telephone Company (“Carr”) 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 Carr Telephone Company hereby challenges the competitive coverage in certain census blocks contained in the latest version of the A-CAM model (ver. 2.2).

I. BACKGROUND

Carr Telephone Company serves six townships in the Mason, Lake, Oceana, and Newago Counties in the State of Michigan. Carr Telephone consists of 100% rural service area.

The Company’s Study Area Code (“SAC”) is 310683 and its FCC Registration Number (“FRN”) is 0005-0672-28. 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

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*”).

support by excluding census blocks where Form 477 data erroneously indicates the presence of unsubsidized competitive providers. These errors in the A-CAM model reduces Carr's potential model-based support.

II. DEMONSTRATION OF ERRONEOUS COMPETITIVE FORM 477 DATA

In regard to unsubsidized competitors identified in certain census blocks within Carr'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 providers do not offer broadband service in census blocks within the Company's study area.

Crystal Automation Systems, Inc. ("Casair") FRN 0012042255

According to the A-CAM, Casair offers fixed wireless in census block 261270105001126 in Carr's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Casair (data as of June 30, 2015). Casair does not offer any broadband service in this block in Carr's study area. Carr personnel placed a secret shopper phone call inquiring about service placed to Casair on April 27, 2016 to inquire whether service was available for two addresses, 8868 E. Monroe Road, Walkerville, Michigan, 49459 and 9520 E. Monroe Road, Walkerville, Michigan, 49459 in census block 261270105001126. Casair's filed map states they service the census block stated above, but they do not serve the above stated addresses. Carr can service those two addresses as stated in the fully funded ACAM model. Per Casair's sales department staff they verbally stated that they do not provide service to those two addresses. Sales staff contacted the President who is travelling and we are confident that he will not be providing us with an affidavit to this fact today.

³ *USF Reform Order* at footnote 31.

Accordingly, Casair erroneously reported this block as one in which it offers broadband service and, in the next release of the A-CAM, this block should not be shown as one in which Carr offers service as an unsubsidized competitor.

III. CONCLUSION

For the reasons stated above, Carr Telephone Company 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 Carr Telephone Company 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,

Teresa Bogner, Secretary
Carr Telephone Company

Filed April 28, 2016

Attachment

DECLARATION OF TERESA BOGNER

I, Teresa Bogner, am Secretary of Carr Telephone Company (“Company”). I have personal and direct knowledge of the representations made by CASair in its April 28 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 CASair does not provide broadband service as an unsubsidized competitor in Company’s incumbent telephone service area. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2016

A handwritten signature in cursive script that reads "Teresa Bogner". The signature is written in black ink and is positioned above the printed name and title.

Teresa Bogner, Secretary
Carr Telephone Company