



April 28, 2016

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket 10-90
Comments re: Competitive Coverage Challenge
Silver Star Telephone Company, Inc., Study Area Code 512295, FRN 0001630532

Dear Ms. Dortch:

Silver Star Telephone Company, Inc. ("Silver Star") hereby submits the following comments regarding the competitive coverage data contained in v.2.2 of the Alternative Cost Allocation Model ("A-CAM") for the unsubsidized competitors and the claimed census block coverage, pursuant to Public Notice DA-16-378, Released April 7, 2016.

Silver Star has reviewed the relevant June 2015 477 data as filed, summarized and posted on the FCC Wireline Competition Broadband Deployment Data from FCC Form 477 website (<https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477>; State-Level Data (version 2), WY-Fixed – Jun 15 (CSV)) and notes the following discrepancies:

1. By its own filing, wyoming.com does not meet the minimum 10/1 speed threshold and is, therefore, not qualified as an eligible competitor.
3. GCI Communications, Skycasters and HughesNet are satellite-technology providers and are, therefore, not qualified eligible competitors.
4. By its own filing, Digis (also known as Rise Broadband) does not meet the minimum 10/1 speed threshold and is, therefore, not qualified as an eligible competitor.

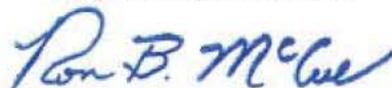
Silver Star respectfully submits that any census blocks reported and presumed to be served and which were excluded from model support calculations by the above-mentioned entities within Silver Star's service area should not be ineligible for model support.

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Questions concerning the information contained herein should be directed to Ron B. McCue, President/COO at 307-883-6670 or Michelle Motzkus, Legal & Regulatory Administrator at 307-883-6690.

Respectfully submitted,



Ron B. McCue
President and Chief Operations Officer