

April 28, 2016

*Via ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90 Midstate Telephone  
Challenge to Competitive Coverage of Northwest Communications Cooperative**

Dear Ms. Dortch:

On behalf of Midstate 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: Northwest Communications Cooperative

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

Filing Entity:	Midstate Telephone
FRN (if applicable):	0003-7558-08
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:	<a href="mailto:phintz@otcpas.com">phintz@otcpas.com</a>
Phone Number of Person Filling out Form:	(651) 483-4521
Name of Person Certifying Data within Form:	Ryan Wilhelmi
Mailing Address of Person Certifying Data within Form:	P.O. Box 400, Stanley, ND 58784
Email Address of Person Certifying Data within Form:	<a href="mailto:ryanw@midstate.net">ryanw@midstate.net</a>
Phone Number of Person Certifying Data within Form:	(701) 628-2522





Form No. 10-1980-28B

1. **Project Title:** RESEARCH AND DEVELOPMENT  
 2. **Project Number:** 428-16  
 3. **Project Location:** RESEARCH AND DEVELOPMENT  
 4. **Project Description:** RESEARCH AND DEVELOPMENT  
 5. **Project Status:** RESEARCH AND DEVELOPMENT  
 6. **Project Start Date:** RESEARCH AND DEVELOPMENT  
 7. **Project End Date:** RESEARCH AND DEVELOPMENT  
 8. **Project Manager:** RESEARCH AND DEVELOPMENT  
 9. **Project Sponsor:** RESEARCH AND DEVELOPMENT  
 10. **Project Budget:** RESEARCH AND DEVELOPMENT  
 11. **Project Funding Source:** RESEARCH AND DEVELOPMENT  
 12. **Project Risk Level:** RESEARCH AND DEVELOPMENT  
 13. **Project Impact:** RESEARCH AND DEVELOPMENT  
 14. **Project Stakeholders:** RESEARCH AND DEVELOPMENT  
 15. **Project Deliverables:** RESEARCH AND DEVELOPMENT  
 16. **Project Milestones:** RESEARCH AND DEVELOPMENT  
 17. **Project Risks:** RESEARCH AND DEVELOPMENT  
 18. **Project Opportunities:** RESEARCH AND DEVELOPMENT  
 19. **Project Challenges:** RESEARCH AND DEVELOPMENT  
 20. **Project Success Factors:** RESEARCH AND DEVELOPMENT

21. **Project Objectives:** RESEARCH AND DEVELOPMENT  
 22. **Project Scope:** RESEARCH AND DEVELOPMENT  
 23. **Project Constraints:** RESEARCH AND DEVELOPMENT  
 24. **Project Assumptions:** RESEARCH AND DEVELOPMENT  
 25. **Project Dependencies:** RESEARCH AND DEVELOPMENT  
 26. **Project Resources:** RESEARCH AND DEVELOPMENT  
 27. **Project Communication:** RESEARCH AND DEVELOPMENT  
 28. **Project Reporting:** RESEARCH AND DEVELOPMENT  
 29. **Project Review:** RESEARCH AND DEVELOPMENT  
 30. **Project Approval:** RESEARCH AND DEVELOPMENT  
 31. **Project Sign-off:** RESEARCH AND DEVELOPMENT  
 32. **Project Closure:** RESEARCH AND DEVELOPMENT  
 33. **Project Archiving:** RESEARCH AND DEVELOPMENT  
 34. **Project Post-mortem:** RESEARCH AND DEVELOPMENT  
 35. **Project Lessons Learned:** RESEARCH AND DEVELOPMENT  
 36. **Project Best Practices:** RESEARCH AND DEVELOPMENT  
 37. **Project Continuous Improvement:** RESEARCH AND DEVELOPMENT  
 38. **Project Innovation:** RESEARCH AND DEVELOPMENT  
 39. **Project Sustainability:** RESEARCH AND DEVELOPMENT  
 40. **Project Social Responsibility:** RESEARCH AND DEVELOPMENT

The small number on this page may project to the project for these documents from 10-1980-28B.

FCC Form 505 - Exhibit A

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

Northwest Communications in North Dakota:

Per the National Broadband Map, Northwest Communications Cooperative claims to offer voice service in 49 Census Blocks within Midstate's Study Area. Mid-state hereby challenges such claims with respect to all 49 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, Midstate challenges the competitive presence of Northwest Communications Cooperative in the Census Blocks listed on its Form 505.

OCN #	OCN_NAME	ABBRE OCN_NAME
1617	MIDSTATE TELEPHONE CO.	MIDSTATE TEL CO - ND
1625	NORTHWEST COMMUNICATIONS COOPERATIVE	NORTHWEST COMM CORE

LATA	LATA NAME	NPA	NXX	OCN	LOC NAME	LOC STATE
638	BISMARK NORTH DAKOTA	701	528	1625	ALAMO	ND
638	BISMARK NORTH DAKOTA	701	377	1625	BOWBELLS	ND
638	BISMARK NORTH DAKOTA	701	939	1625	COLUMBUS	ND
638	BISMARK NORTH DAKOTA	701	965	1625	CROSBY	ND
638	BISMARK NORTH DAKOTA	701	859	1625	EPPING	ND
638	BISMARK NORTH DAKOTA	701	596	1625	FLAXTON	ND
638	BISMARK NORTH DAKOTA	701	694	1625	GRENORA	ND
638	BISMARK NORTH DAKOTA	701	933	1625	LIGNITE	ND
638	BISMARK NORTH DAKOTA	701	826	1625	MARMON	ND
638	BISMARK NORTH DAKOTA	701	546	1625	MCGREGOR	ND
638	BISMARK NORTH DAKOTA	701	623	1617	MEDORA	ND
638	BISMARK NORTH DAKOTA	701	925	1625	NOONAN	ND
638	BISMARK NORTH DAKOTA	701	926	1617	PORTAL	ND
638	BISMARK NORTH DAKOTA	701	464	1625	POWERSLAKE	ND
638	BISMARK NORTH DAKOTA	701	568	1625	RAY	ND
638	BISMARK NORTH DAKOTA	701	875	1625	ROUNDPRARI	ND
638	BISMARK NORTH DAKOTA	701	628	1617	STANLEY	ND
638	BISMARK NORTH DAKOTA	701	664	1625	TIOGA	ND
638	BISMARK NORTH DAKOTA	701	539	1625	WILDROSE	ND