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

Dear Ms. Dortch:

On behalf of Franklin Telephone Company (“Franklin”), JSI files the attached Franklin 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”).

The Company's Study Area Code ("SAC") is 280454 and its FCC Registration Number ("FRN") is 0001742170. As further outlined below, Franklin maintains that the latest version of the A-CAM contains errors that are significantly impacting the total number of locations eligible for support by excluding census blocks where Form 477 data erroneously indicates the presence of unsubsidized competitive providers. These errors in the A-CAM model significantly reduces Franklin's potential model-based support.

Through this petition, Franklin is not challenging all competitive overlap information within the A-CAM for its study area, as there are some unsubsidized competitors operating in a few of the Company's census blocks in compliance with the Commission's standards, but there are certain census blocks that contain erroneous competitive overlap findings, which Franklin is seeking to have corrected in the next release of the A-CAM.

II. DEMONSTRATION OF ERRONEOUS COMPETITIVE FORM 477 DATA

In regard to unsubsidized competitors identified in certain census blocks within Franklin'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.

a. Mediacom Southeast LLC (FRN: 0003769361 & 00004036778)

According to the A-CAM, Mediacom Southeast LLC ("Mediacom") offers cable modem services (technology code 42) in census blocks 280399503013013 and 280399503022151 in Franklin's study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Mediacom (data as of June 30, 2015). As demonstrated in Attachment B, Mediacom does not offer any broadband service in these blocks in Franklin's study area. Accordingly, Mediacom erroneously reported these blocks as ones in which it offers broadband

³ *USF Reform Order* at footnote 31.

service and, in the next release of the A-CAM, these blocks should be not be shown as ones in which Mediacom offers service as an unsubsidized competitor.

b. Cable One, Inc.

According to the A-CAM, Cable One, Inc. (“Cable One”) offers cable modem services (technology code 42) in census blocks 280590402014053 in Franklin’s study area. The competitive overlap data in the A-CAM is based on FCC Form 477 data submitted by Cable One (data as of June 30, 2015). As demonstrated in Attachment 3, Cable One does not offer any broadband service in these blocks in Franklin’s study area. Accordingly, Cable One erroneously reported these blocks as ones in which it offers broadband service and, in the next release of the A-CAM, these blocks should be not be shown as ones in which Cable One offers service as an unsubsidized competitor.

III. CONCLUSION

For the reasons stated above, Franklin 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 Franklin 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,

/s/

Filed April 28, 2016

Attachments

DECLARATION OF TOM GRIFFIN, P.E.

I, Tom Griffin, P.E., am Vice President/General Manager of Franklin Telephone Company (“Franklin” or the “Company”). I have over 26 years in the telecommunications industry primarily with Rural ILEC’s but also with CATV, CLEC and CMRS operations. I hold a BSEE from Mississippi State University and a license to practice engineering in the State of Mississippi (MS Professional Engineer Certificate 16779). I have been responsible for all technical aspects of Franklin’s broadband deployments, including but not limited to, the provisioning of service, both copper DSL and Fiber to the Home, at the customer’s home.”

Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein. I verify that Mediacom and Cable One, Inc. (“Competitors”) do not provide 10/1 Mbps broadband and voice service as an unsubsidized competitor in the census blocks listed in Franklin’s comments. I verify that I drove through each census block and found no facilities owned by the Competitors. I continued to search for the nearest coaxial termination point to these census blocks, and the nearest facility I was able to locate was approximately eleven miles distance from the blocks.

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

Executed on April 28, 2016

A handwritten signature in blue ink, appearing to read "Tom Griffin", is written over a horizontal line.

TOM GRIFFIN, P.E.

FRANKLIN TELEPHONE COMPANY