

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 Park Region Mutual Telephone Company  
Challenge to Competitive Coverage of Arvig Enterprises d/b/a Tekstar  
Communications**

Dear Ms. Dortch:

On behalf of Park Region Mutual Telephone Company, 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: Tekstar Communications

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

Filing Entity:	Park Region Mutal Telephone Co.
FRN (if applicable):	0002-6504-22
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) 621-8535
Name of Person Certifying Data within Form:	Dave Bickett
Mailing Address of Person Certifying Data within Form:	P.O. Box 277, Underwood, MN 56586
Email Address of Person Certifying Data within Form:	<a href="mailto:dave.bickett@parkregion.com">dave.bickett@parkregion.com</a>
Phone Number of Person Certifying Data within Form:	(218) 826-8302

Served to Unserved Challenge

Census Block 15 Digit FIPS Code	State	Provider Name as Listed in National Broadband Map	Insert X if Spread Criteria Not Met	Insert X if Usage 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
271119608003136	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119608003137	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119608003141	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001002	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001004	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001007	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001008	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001010	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001011	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001015	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001056	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001059	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001062	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612001063	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612002011	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119612002017	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119614001080	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119614001083	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119614001089	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119614001123	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119614001125	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119614001126	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A
271119615001067	MN	Arvig Enerprises d/b/a Tekstar Communications					X	Analysis of locations shows no competitors	See supporting evidence filed with FCC Form 505 in Exhibit A

<u>Accuracy and Due Diligence Certification</u>	
<i>All Filers Must Fill Out</i>	
By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.	
Certifier's Initials:	DAB
Date:	4-28-2016

<u>Notice of Challenge Certification</u>	
<i>(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)</i>	
<b>Service of Notice Successful</b>	
By initialing below, I certify that notice of this challenge has been served on all interested parties.	
Certifier's Initials:	DAB
Date:	4-28-2016
<b>Service of Notice Unsuccessful</b>	
By initialing 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 Initials:	
Date:	

The certifications on this page are subject to the penal(ies) 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*

Tekstar Communications (Holding Company Arvig Enterprises) in Minnesota:

Per the National Broadband Map, Tekstar Communications (“Tekstar”) claims to offer voice service in 23 Census Blocks in Park Region’s Serving Area. Park Region hereby challenges such claims with respect to all 49 Census Blocks. As reflected in the attached screenshot from the Local Exchange Routing Guide (“LERG”) Tekstar, (OCN 4156) does not have numbering resources in Park Region’s Study Area. Further Park Region does not presently have local interconnection arrangements in place with any competitive providers within its Study Area and therefore has not been the recipient of any porting requests.

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

← Park Regio

PORTABLE	AOCN	FILLE	OCN	LOC NAME	LOC INDEX	LOC STATE	RC ABBRE	RC TYPE	LINE FR	LINE TO
Y	G023		1450	ERHARD		MN	ERHARD		0000	9999
Y	G023		1450	UNDERWOOD		MN	UNDERWOOD		0000	9999
Y	G023		1450	VINING		MN	VINING		0000	9999
Y	G023		1450	ASHBY		MN	ASHBY		0000	9999
Y	G023		1450	DALTON		MN	DALTON		0000	9999
Y	G023		1450	MAINE		MN	MAINE		0000	9999

↳ TEKSTAR

PORTABLE	AOCN	FILLE	OCN	LOC NAME	LOC INDEX	LOC STATE	RC ABBRE	RC TYPE	LINE FR	LINE TO
Y	G039		4156	MAHNOMEN		MN	MAHNOMEN		0000	9999
Y	G039		4156	PARKRAPIDS		MN	PARKRAPIDS		0000	9999
Y	G039		4156	CASS LAKE		MN	CASS LAKE		0000	9999
Y	G039		4156	HAWLEY		MN	HAWLEY		0000	9999
Y	G039		4156	HENNING		MN	HENNING		0000	9999
Y	G039		4156	PARKRAPIDS		MN	PARKRAPIDS		3000	3999
Y	G039		4156	WADENA		MN	WADENA		0000	9999
Y	G039		4156	DETROITLKS		MN	DETROITLKS		0000	9999
Y	G039		4156	BATTLELAKE		MN	BATTLELAKE		0000	9999
Y	G039		4156	BEMIDJI		MN	BEMIDJI		8000	8999
Y	G039		4156	STAPLES		MN	STAPLES		0000	9999
Y	G039		4156	TWINCITIES		MN	TWINCITIES		1000	1999
Y	G039		4156	ST CLOUD		MN	ST CLOUD		0000	9999
Y	G039		4156	ST CLOUD		MN	ST CLOUD		1000	1999
Y	G039		4156	ROCHESTER		MN	ROCHESTER		0000	9999
Y	G039		4156	ROCHESTER		MN	ROCHESTER		1000	1999
Y	G039		4156	TWINCITIES		MN	TWINCITIES		0000	9999
Y	G039		4156	TWINCITIES		MN	TWINCITIES		1000	1999
Y	G039		4156	TWINCITIES		MN	TWINCITIES		1000	1999
Y	G039		4156	TWINCITIES		MN	TWINCITIES		6000	6999
Y	G039		4156	STAPLES		MN	STAPLES		0000	9999