

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
ETC Annual Reports and Certifications)	WC Docket No. 14-58
)	
Developing a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	

COMMENTS OF SRT COMMUNICATIONS.
CHALLENGING COMPETITIVE COVERAGE IN A-CAM MODEL

On March 30, 2016, the FCC released its Order reforming the Universal Support Fund (USF) regime for rural local exchange carriers (RLECs).¹ One provision of the USF Reform Order was the creation of an alternative, incentive-based support mechanism, utilizing a “forward-looking, efficient mechanism [and] model-based support.”²

That Alternative Connect America Model (A-CAM) “excludes from support calculations those census blocks that are presumed to be served by an unsubsidized competitor.”³ The Order acknowledges that filed Form 477 data may not be accurate, however, so establishes a challenge process for “commenters to challenge the competitive coverage contained in the updated version of the model.”⁴

On April 7, the Wireline Competition Bureau (WCB) released a public notice commencing that challenge process.⁵ Accordingly, SRT Communications (SRT), FRN 4313342 an RLEC serving

¹ Report and Order FCC 16-33, hereafter referred to as the “USF reform order.” Accessed at https://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0330/FCC-16-33A1.pdf.

² USF Reform Order, ¶4.

³ USF Reform Order, ¶159.

⁴ USF Reform Order, ¶71.

⁵ Public Notice DA 16-378. Accessed at http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0407/DA-16-378A1.pdf.

northwestern North Dakota, is challenging model assumptions regarding competitive coverage within the SRT study area (383303).

SRT challenges the competitor coverage of North Dakota Telephone Company FRN 2638641 (ND Telephone), United Telephone Mutual dba Turtle Mountain Communications, Inc., FRN 3740628 (United) and Reservation Telephone Cooperative FRN 2477743 (Reservation Telephone) in certain census blocks in the latest version of the A-CAM model (ver. 2.2).

The FCC's rules define "unsubsidized competitor," as a provider of "residential fixed voice and broadband service that *does not receive high-cost support*" (emphasis added).⁶ Recently-released June 2015 Form 477 data identifies subsidized carriers reporting qualifying broadband speeds within the SRT study area impacting 13 census blocks. The census blocks in question were erroneously reported within STR's study area, which results in the removal of census blocks from SRT's A-CAM support calculation. ND Telephone, United and Reservation Telephone are not unsubsidized competitors since each receive USF High Cost support (see the attached exhibits).

SRT appreciates the opportunity granted by the FCC to improve the model results. Given the facts as established by this challenge and pursuant to the USF Reform Order, we request that information accurately reflecting the competitive landscape within SRT's study area be incorporated "so that these updates [can be] reflected in the final version of the model that is released for purposes of the offer of support."⁷

Respectfully submitted,
By: /s/ Steve L. Lysne
General Manager/CEO
SRT Communications
3615 North Broadway
Minot, ND 58703

⁶ 47 CFR § 54.5. This key definitional emphasis on residential service was echoed in the USF Reform Order at ¶128.

⁷ USF Reform Order at ¶71.

SRT Communications

Census Blocks Inaccurately Listed as Served by an Unsubsidized Carrier by Carrier

North Dakota Telephone Company
(FRN 2638641)

United Telephone Mutual
(dba Turtle Mountain Communications, Inc.)
(FRN 3740628)

Reservation Telephone
Cooperative
(FRN 2477743)

380499556002860
380499556002861
380499559002611
380699562003770
380839602001161
380839602001163
380839602001164
380839602001173

380099524002219
380099524002220
380799517002238
380799517003045

381010110002016

NORTH DAKOTA TELEPHONE COMPANY USF HIGH COST FUNDING DISBURSEMENTS



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FUNDING DISBURSEMENT SEARCH RESULTS

498 ID=Service Provider and Billed Entity Identification Number; HCL=High Cost Loop; HCM=High Cost Model; IAS=Interstate Access Support; ICLS=Interstate Common Line Support; LSS=Local Switching Support; SNA=Safety Net Additive Support; SVS=Safety Valve Support; FHCS=Frozen High Cost Support; IS=Incremental Support; ICC=Connect America Fund Inter-carrier Compensation; Mobility I=Mobility Fund Phase One; CACM =Connect America Cost Model; RBE = Rural Broadband Experiments Fund.

High Cost Disbursement Data (498 ID = ALL , SAC = 381447 , SAN = ALL , Year = ALL , Month = ALL , State = ALL)
 This disbursement tool contains data from Jan 2003 through Mar 2016.

State	498 ID	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	SNA	SVS	FHCS	IS	ICC	Mobility I	CACM	RBE	Year	Month
ND	143002198	381447	NORTH DAKOTA TEL CO	\$47,842	\$0	\$0	\$223,832	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2016	Mar
ND	143002198	381447	NORTH DAKOTA TEL CO	\$47,842	\$0	\$0	\$223,832	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2016	Feb
ND	143002198	381447	NORTH DAKOTA TEL CO	\$42,955	\$0	\$0	\$223,832	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2016	Jan
ND	143002198	381447	NORTH DAKOTA TEL CO	\$50,073	\$0	\$0	\$223,711	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2015	Dec
ND	143002198	381447	NORTH DAKOTA TEL CO	\$50,073	\$0	\$0	\$223,711	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2015	Nov
ND	143002198	381447	NORTH DAKOTA TEL CO	\$51,060	\$0	\$0	\$223,711	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2015	Oct
ND	143002198	381447	NORTH DAKOTA TEL CO	\$50,058	\$0	\$0	\$223,711	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2015	Sep
ND	143002198	381447	NORTH	\$50,058	\$0	\$0	\$223,711	\$0	\$0	\$0	\$0	\$0	\$89,723	\$0.00	\$0	\$0.00	2015	Aug

UNITED TELEPHONE MUTUAL (dba TURTLE COMMUNICAITONS INC.) USF HIGH COST FUNDING DISBURSEMENTS



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High Cost Disbursement Data (498 ID = ALL , SAC = 381636 , SAN = ALL , Year = ALL , Month = ALL , State = ALL)

This disbursement tool contains data from Jan 2003 through Mar 2016.

State	498 ID	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	SNA	SVS	FHCS	IS	ICC	Mobility I	CACM	RBE	Year	Month
ND	143002216	381636	UNITED TEL MUTUAL	\$86,682	\$0	\$0	\$249,226	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2016	Mar
ND	143002216	381636	UNITED TEL MUTUAL	\$86,682	\$0	\$0	\$249,226	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2016	Feb
ND	143002216	381636	UNITED TEL MUTUAL	\$82,794	\$0	\$0	\$249,226	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2016	Jan
ND	143002216	381636	UNITED TEL MUTUAL	\$21,946	\$0	\$0	\$210,213	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2015	Dec
ND	143002216	381636	UNITED TEL MUTUAL	\$21,946	\$0	\$0	\$210,213	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2015	Nov
ND	143002216	381636	UNITED TEL MUTUAL	\$22,709	\$0	\$0	\$210,213	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2015	Oct
ND	143002216	381636	UNITED TEL MUTUAL	\$21,934	\$0	\$0	\$210,213	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2015	Sep
ND	143002216	381636	UNITED TEL MUTUAL	\$21,934	\$0	\$0	\$210,213	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2015	Aug
ND	143002216	381636	UNITED TEL MUTUAL	\$23,644	\$0	\$0	\$210,213	\$0	\$0	\$0	\$0	\$0	\$113,366	\$0.00	\$0	\$0.00	2015	Jul
ND	143002216	381636	UNITED TEL MUTUAL	\$21,649	\$0	\$0	\$147,789	\$0	\$0	\$0	\$0	\$0	\$84,239	\$0.00	\$0	\$0.00	2015	Jun
ND	143002216	381636	UNITED TEL MUTUAL	\$21,649	\$0	\$0	\$147,789	\$0	\$0	\$0	\$0	\$0	\$84,239	\$0.00	\$0	\$0.00	2015	May

RESERVATION TELEPHONE COOPERATIVE USF HIGH COST FUNDING DISBURSEMENTS



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High Cost Disbursement Data (498 ID = ALL , SAC = 381632 , SAN = ALL , Year = ALL , Month = ALL , State = ALL)

This disbursement tool contains data from Jan 2003 through Mar 2016.

State	498 ID	Study Area Code	Study Area Name	HCL	HCM	IAS	ICLS	LSS	SNA	SVS	FHCS	IS	ICC	Mobility I	CACM	RBE	Year	Month
ND	143002214	381632	RESERVATION TEL COOP	\$377,407	\$0	\$0	\$502,276	\$0	\$24,362	\$34,899	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2016	Mar
ND	143002214	381632	RESERVATION TEL COOP	\$377,407	\$0	\$0	\$502,276	\$0	\$24,362	\$37,412	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2016	Feb
ND	143002214	381632	RESERVATION TEL COOP	\$373,171	\$0	\$0	\$502,276	\$0	\$24,362	\$32,386	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2016	Jan
ND	143002214	381632	RESERVATION TEL COOP	\$321,851	\$0	\$0	\$452,298	\$0	\$24,362	\$0	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2015	Dec
ND	143002214	381632	RESERVATION TEL COOP	\$321,851	\$0	\$0	\$452,298	\$0	\$24,362	\$0	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2015	Nov
ND	143002214	381632	RESERVATION TEL COOP	\$322,547	\$0	\$0	\$452,298	\$0	\$24,362	\$0	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2015	Oct
ND	143002214	381632	RESERVATION TEL COOP	\$321,839	\$0	\$0	\$452,298	\$0	\$24,362	\$0	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2015	Sep
ND	143002214	381632	RESERVATION TEL COOP	\$321,839	\$0	\$0	\$452,298	\$0	\$24,362	\$0	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2015	Aug
ND	143002214	381632	RESERVATION TEL COOP	\$323,411	\$0	\$0	\$452,298	\$0	\$24,362	\$0	\$0	\$0	\$59,493	\$0.00	\$0	\$0.00	2015	Jul
ND	143002214	381632	RESERVATION TEL COOP	\$316,813	\$0	\$0	\$386,988	\$0	\$24,362	\$0	\$0	\$0	\$54,028	\$0.00	\$0	\$0.00	2015	Jun
ND	143002214	381632	RESERVATION TEL COOP	\$316,813	\$0	\$0	\$386,988	\$0	\$24,362	\$0	\$0	\$0	\$54,028	\$0.00	\$0	\$0.00	2015	May