



Via ECFS

April 28, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street S.W.
Washington, D.C. 20554

**Re: WC Docket No. 10-90
Kasson & Mantorville Telephone Company
Challenge to A-CAM V2.2 Competitive Coverage**

Dear Ms. Dortch:

The first phase of the USF Order released on March 30, 2016 is to allow companies that may elect Alternative Connect America Cost Model (A-CAM) "model-based" support to file challenges related to competitive overlap information contained in the model. The A-CAM model utilizes voice and broadband service provider information gathered from FCC Form 477 filings available as of June 30, 2015.

Kasson & Mantorville Telephone Company (KMTelecom), SAC 361412, respectfully submits the following challenges related to competitors identified in the A-CAM model. Service provider data being challenged are listed follows:

1. Hiawatha Broadband Communications, Inc.
2. LTD Broadband, LLC
3. King Street PCS, Inc.
4. Radio Link Internet

Per the following FCC's "USF Reform Order" FCC 16-33¹, paragraph no. 128, an unsubsidized competitor must provide residential fixed voice service:

"Under our existing rule, to be considered an unsubsidized competitor, a provider must be a facilities-based provider of residential fixed voice service, as well as fixed broadband. Form 477 provides the best data available on whether broadband providers also offer fixed voice service, but the data are not reported at the census block level. Therefore, to determine whether a broadband provider also offers voice service, for purposes of preparing the preliminary list, the Bureau will assume if a broadband provider reported any fixed voice connections in a state in its Form 477 filing, then it offers voice service throughout its entire broadband service area in that state."

¹ See Connect America Fund et al., WC Docket No. 10-90 et al., Order, FCC 16-33 (rel. Mar. 30, 2016) ("USF Reform Order").



Hiawatha Broadband Communications (HBC) is a facilities-based provider of residential fixed voice service, however, the company does not offer voice services in KMTelecom's service territory. KMTelecom's service area includes the Kasson, Mantorville, and Rock Dell, Minnesota telephone exchanges. Per the attached 3/22/16 HBC tariff page and service letter filed with the Minnesota Department of Public Service (Exhibit A), HBC's service area does not include Kasson, Mantorville or Rock Dell, Minnesota exchanges within its defined 'Description and Area of Operations'. Since HBC does not provide voice service in KMTelecom's service territory it should not be considered an unsubsidized competitor with respect to the A-CAM model. KMTelecom requests that the Form 477 census blocks reported by HBC be included as 'eligible census blocks' for A-CAM Model based support calculation purposes per the listing included in Form 505 attached to this filing.

KMTelecom also requests that LTD Broadband, LLC (LTD), King Street Wireless L.P. (King Street) and Radio Link Internet (Radio Link) reported census blocks be included as 'eligible census blocks' for A-CAM Model based support settlement purposes. KMTelecom challenges the companies inclusion as unsubsidized competitors as neither LTD, King Street, nor Radio Link are certified telecommunications providers in the state of Minnesota. Consequently, the companies do not qualify as unsubsidized competitors in KMTelecom's service territory consistent with the FCC's voice service requirement². The affected census blocks are listed in Form 505 as well as additional supporting documentation included in Exhibit B.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

A handwritten signature in blue ink that reads "Dean Uher". The signature is written in a cursive style and is positioned above a horizontal line.

Dean Uher
Director of Regulatory Affairs

Enclosures: Declaration
Exhibit A
Exhibit B
FCC Form 505

cc: Katie King, via email (Katie.King@fcc.gov)

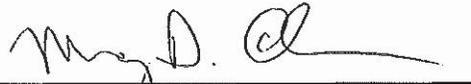
² See Connect America Fund et al., WC Docket No. 10-90 et al., Order, FCC 16-33 (rel. Mar. 30, 2016) ("USF Reform Order").

DECLARATION OF COMPANY REPRESENTATIVE NAME

I, Mary Ehmke, President of the Kasson & Mantorville Telephone Company I have personal and direct knowledge of the representations made by Kasson & Mantorville Telephone Company in its April 28, 2016 comments to the Federal Communications Commission, Docket No. 10-90 regarding the Company's service area and representative overlapping service providers. Based upon my personal and direct knowledge, I verify the truth and accuracy of the information contained herein including all attachments.

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

Executed on April 28, 2016

A handwritten signature in black ink, appearing to read "Mary D. Ehmke", written over a horizontal line.

Mary Ehmke
President
Kasson & Mantorville Telephone Company
FRN: 3741535



VIA Electronic Filing
Date: March 22, 2016

Daniel P. Wolf
Minnesota Department of Public Service
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

Dear Mr. Wolf:

Attached for electronic filing is a replacement tariff for Hiawatha Broadband Communications, Inc. M.P.U.C. Tariff 3. The company makes this filing with a March 22nd issue date and a proposed effective date of March 22, 2016.

DOCKET: SUPPLMENT TO DOCKET 16-171

If you have any questions or concerns please contact me at
(507) 474-5870.

Sincerely,

A handwritten signature in black ink that reads 'Rochelle Pervisky'. The signature is written in a cursive style.

Rochelle Pervisky
Vice President of Regulatory

Hiawatha Broadband Communications, Inc.
Winona, MN 55987
Supplement to Docket 16-171
Issue Date: March 22, 2016

M.P.U.C No 3
Replaces Tariff M.P.U.C 1 and 2

Effective Date: March 22, 2016

DESCRIPTION AND AREA OF OPERATIONS

Hiawatha Broadband Communications, Inc. (Company) is providing telecommunications service in the areas certificated to the Company by the Minnesota Department of Commerce.

Headquarters for the Company are located at:

58 Johnson Street, Winona, MN 55987

Company representatives may be contacted at 888-474-9995

Areas of Operation

Winona, St. Charles, Wabasha, Rollingstone, Lewiston, Stockton, Minneiska, Utica, Red Wing, Lake City, Eyota, Plainview, Elgin, Dover, Altura, Kellogg, Weaver, Reads Landing, Cannon Falls, Goodhue, New Trier and Miesville, Minnesota.

ltdbroadband.com 507-369-6669

PLANS SITE SURVEY ABOUT US CONTACT US

3MBPS 0.5 mbps upload	6MBPS 1 mbps upload	10MBPS 2 mbps upload
\$105 for 3 months (works out to \$35/mo)	\$165 for 3 months (works out to \$55/mo)	\$225 for 3 months (works out to \$75/mo)
\$198 for 6 months (works out to \$33/mo)	\$318 for 6 months (works out to \$53/mo)	\$438 for 6 months (works out to \$73/mo)
\$360 for 12 months (works out to \$30/mo)	\$600 for 12 months (works out to \$50/mo)	\$840 for 12 months (works out to \$70/mo)
Get Started	Get Started	Get Started

LTD Broadband
LTD Broadband provides high speed fixed-wireless internet service in southern Minnesota and northern Iowa. High speed wireless offers faster speeds and better reliability than DSL, cell-phone company wireless or satellite and no land line phone is required.

Get in Touch
LTD Broadband
Phone: 507-369-6669
Email: ltdbroadband@gmail.com

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ltdbroadband.com/about.html 507-369-6669

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Why choose LTD Broadband?

1. Fast speeds
2. Great pricing - as low as \$30/mo
3. Reliable network
4. Amazing tech support - local techs
5. Unlimited service - no download caps

LTD Broadband was founded with the goal of providing rural areas with reliable, inexpensive high speed internet with no bandwidth caps and no long term contracts.

We have helped hundreds of customers upgrade from Clearwave, Wild Blue, Hughesnet, phone company DSL, cell phone company hot spots and dialup.

LTD Broadband opened for business in 2011 with one tower Rose Creek, MN. Now LTD Broadband has over 100 towers in southern Minnesota and northern Iowa.

Get in Touch
LTD Broadband
Phone: 507-369-6669
Email: ltdbroadband@gmail.com

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www.kingstreetwireless.com/index.html

Apps Dean Uher - Outlook SpringAhead: Login Other bookmarks



Home About Us What is 4G LTE About Spectrum Fixed Wireless Services Partners & Resources Community Engagement News

King Street is a Leader in 700 MHz Wireless Spectrum

King Street Wireless L.P., a Virginia-based leader in wireless communications, is committed to developing, managing and deploying wireless spectrum around the country.



Welcome to King Street Wireless.

The company holds 152 licenses of 700 MHz spectrum in 27 states and is at the forefront of 4G technology. King Street has partnered with Chicago-based U.S. Cellular delivering high-speed 4G LTE service to U.S. Cellular's customers.

Together we provide high-speed 4G LTE and 4G-enabled devices to customers in over 100 markets across the country. King Street is a top ten holder of 700 MHz wireless spectrum in the US, and our coverage areas include large parts of New England, the Midwest, the Mid-Atlantic, the South and the Pacific Northwest.

 News: [King Street Wireless & US Cellular Invested over \\$27 million in Virginia](#)

King Street Wireless, LP
526 King Street, Suite 209
Alexandria, VA 22314

Contact Us
Email: Info@kingstreetwireless.com
Corporate Headquarters: (703) 518-9902
Fixed Wireless Services: 1-800-696-8543
Fax: (703) 518-8993



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radiolinkinternet.com/index.html

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Radio Link Internet

Your Rural Wireless Internet Service Provider.



507-417-4176

Providing Internet at the Speed of Life.

Office Hours: Monday through Friday 9am to 5pm, closed on Holidays

Home Service Area Price List FAQ Docs Contact Us News Promotions Pay Bill Other Stuff Careers

Do you want to go faster on the internet? Do you have the internet? Get Radio Link Internet, our internet is always on, very fast and reliable. Since our service uses the airwaves, there is no phone lines needed. We just install a small antenna on your home and you're ready to surf away.

I bet you have thought about renting movies over the internet, but you live where you don't have a fast enough connection to make them work seamlessly. Well with Radio Link Internet, our \$45/month plan is perfect for doing just this. But you probably have an HDTV and you want those movies in HD. Well starting with our \$55/month plan you can take advantage of  in HD.

- Unlimited usage - always on
- Connect to multiple computers
- Blazing fast speeds
- Speeds are comparable to Fiber, without waiting for it

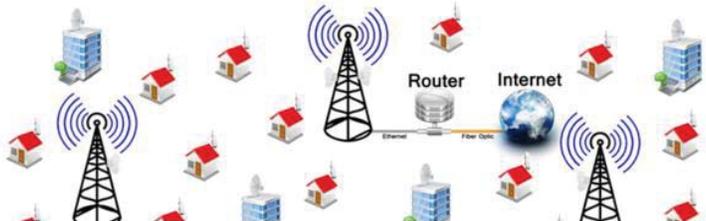



What you get...

High Speed internet
Hassle free service
Personal Support (RLI Service Only)
IPv4 and/or IPv6 Access

What is not provided from us....

E-mail services (except free online ones)
Web space



radiolinkinternet.com/index.html

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Speeds are comparable to fiber, without waiting for it.

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What is not provided from us...

- E-mail services (except free online ones)
- Web space

Where are we...

We are currently serving South Central Minnesota, some of the areas are:

radiolinkinternet.com/index.html

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Where are we...

We are currently serving South Central Minnesota, some of the areas are:

Hope	Moscow	Ellendale
Steele County	Oakland	Waseca County
Litomysl	Janesville	Claremont
Dodge County	New Richland	Blooming Prairie
Le Center	Waldorf	West Concord
Summit Township	Pemberton	South of Cannon Lake
Otisco	Geneva	Lansing
Meriden	Medford	Waterville

Check out our Service Area link to view our map of possible coverage.

Who are we...

We are just that neighbor that was tired of waiting for the big companies to come to us. Our staff has former Military members that has worked with internet, satellite, and radio communications while serving in the Military. The owner brought his expertise in to make what could be the best service viva wireless technology in this area.

How are we different...

We have all lived with slow access to the internet. Most of that time it is because there isn't any other choice for internet providers. Well not anymore, here at RLI we believe that it's time for fast internet. Our system runs faster than our competition. How you might ask? Well if we look at our competitor's fastest residential service at 1mbps, and compare to our starting rate at 1.5mbps you can see you get more for less. We didn't stop there, most DSL and Fiber connections are around 2 to 50 mbps, so our service almost is the same as having DSL or Fiber without having to have a cable buried to your house.

If your still not convinced then lets compare it to dial-up. At our slowest speed 1.5mbps connection, this is over 27x faster than dial-up. Our fastest speed 30mbps connection is over 535x faster than dial-up. As you can see we provide you the speed you need for everything from e-mail to videos.

We didn't stop there, we all see commercials for VoIP services like Vonage. Well our network allows this service to have priority over all other internet traffic. With doing this you can use your VoIP phone service with out having the jitters while talking. Jitters are what happens on our competitors network, due to them not supporting new technologies like VoIP.

If you would like to know more about how we are different, call or e-mail us for an appointment.

Service Information...

This service requires a clear line of sight to one of RLI's towers. So the coverage map is just an estimate of coverage. We will be able to tell you if you can get service when we come and do a free site survey.

Dean Uher

From: Doyle, Greg (COMM) <greg.doyle@state.mn.us>
Sent: Thursday, April 28, 2016 10:15 AM
To: Dean Uher
Cc: McCarthy, Mike (PUC)
Subject: RE: Contact Information

Dean, see below.

Greg Doyle
Manager, Telecommunications
Minnesota Department of Commerce
85 7th Place East, Suite 500, Saint Paul, MN 55101
P: 651-539-1875

From: Dean Uher [mailto:Dean.Uher@farrtechnologies.com]
Sent: Wednesday, April 27, 2016 9:05 AM
To: Doyle, Greg (COMM)
Cc: McCarthy, Mike (PUC)
Subject: RE: Contact Information

Greg,

The companies that I am attempting to verify whether they are a certificated telephone / voice service provider are:

- | | |
|--|--|
| 1. Hiawatha Broadband Communications, Inc. | Certified CLEC |
| 2. LTD Broadband LLC | No Company with this name is certified |
| 3. Jaguar Communications | Certified CLEC |
| 4. King Street PCS, Inc. | No Company with this name is certified |
| 5. Radio Link Internet | No Company with this name is certified |

Thank you!

Dean Uher
Director of Regulatory Affairs



Mobile: +1-605-630-3577
Email: Dean.Uher@FARRTechnologies.com
Web: www.FARRTechnologies.com