Frank Schueneman
Vice President, Regulatory Policy
Windstream Communications, Inc.
4001 N. Rodney Parham Rd.
Little Rock, AR 72212

(501) 748-7482
frank.a.schueneman@windstream.com

June 16, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Requirements in the Broadband Data Improvement Act*, GN Docket No. 09-47; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *International Comparison and Consumer Survey Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, GN Docket No. 09-137

Dear Ms. Dortch:

Yesterday I met with Robert Curtis, Rohit Dixit, Kevin King, Thomas Koutsky, Steven Rosenberg, and Joseph Soban, all in the Federal Communications Commission's Office of Strategic Planning and Policy Analysis. Windstream's William Kreutz joined the meeting by telephone. We discussed and sought clarification in response to the attached list of questions addressing the Omnibus Broadband Initiative gap analysis.[1]

Please feel free to contact me if you require additional information.

Sincerely,

/s/

Frank Schueneman

Attachment

cc: Robert Curtis
Rohit Dixit
Kevin King
Thomas Koutsky
Steven Rosenberg
Joseph Soban

[1] *The Broadband Availability Gap: OBI Technical Paper No. 1* (April 2010), *available at* http://download.broadband.gov/plan/the-broadband-availability-gap-obi-technical-paper-no-1.pdf.

The Broadband Availability Gap OBI Technical Paper No. 1
Questions for 6/15/10 Meeting with the FCC

1. Does the county roll-up represent the sum of all census block calculations for DSL and fixed wireless in each county, and whichever gap was smaller was the chosen technology for the county? Or does the map represent the sum of the lowest gaps, meaning it will add some DSL census blocks and some fixed wireless census blocks to sum to the county costs?

2. Will the FCC provide Windstream with a sample set of information by census block in order for Windstream to be able to compare the model information to it own detailed information on existing broadband availability and cost to build out to unserved areas? The type of information would be:

    - CAPEX required, broken out by type, fiber, electronics, DSLAM
    - number of current DSLAMs, new DSLAMs
    - amount of new fiber
    - number of households and unserved households
    - OPEX required broken out by type, middle mile transport, other
    - revenue assumptions
    - unit cost inputs (are those the Windstream-provided items on page 88?)

3. Does the model contain any cost associated with the purchase of 700 MHz spectrum licenses?

4. What is the assumed spectral efficiency used in the model for FWA and mobile?

5. Does the investment "gap" listed for each county in the "BroadbandMapping" spreadsheet (http://www.broadband.gov/maps/availability.htm) represent the second least costly technology, even though the lowest cost technology is listed in the "LowCostTech" column?

6. How does the satellite solution figure into the $23.5B estimate? Did the model first determine the $23.5B gap based on DSL and wireless, the two lowest cost technologies, and then consider $13.4B in satellite, thus leaving $10.1B for investment in either DSL or wireless?

7. On page 75, it is noted that "a microwave link can provide speeds of up to 500 Mbps over a distance of 20 miles at a typical equipment cost of roughly $50,000." Does the $50,000 include a present value equivalent of tower space rents or ongoing maintenance?

8. As noted on page 81, "[w]e assumed that the likelihood of a tower's presence is half the 2G/3G coverage in the hexagonal cell area. For example, a cell that is fully covered by 2G/3G service has only a 50% chance of having a tower site." Is this referring to the existence of a current tower or a hypothetical tower in the future?