

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Connect America Fund)	WC Docket No. 10-90
A National Broadband Plan for Our Future)	GN Docket No. 09-51
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
High-Cost Universal Service Support)	WC Docket No. 05-337
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
Lifeline and Link-Up)	WC Docket No. 03-109
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208
)	

DECLARATION OF MARK BIRKHOLZ

1. My name is Mark Birkholz. I am employed as Director of Southwest Markets at Redwood County Telephone Company (“Redwood”). My business address is 150 2nd Street SW, Perham, MN. I have been employed at Redwood, a subsidiary of Arvig Communications Systems, in my present capacity for twelve months. Since 1993 I have worked in the telecommunications service provider industry, specifically with subsidiaries of Arvig Communications Systems or their predecessors.

2. In this declaration, I describe Redwood, including its wireless Internet service (“WISP service”). Further, in light of the June 26, 2012, Petition for Waiver filed by

CenturyLink in the above-referenced proceedings, I explain how CenturyLink either mischaracterizes Redwood's WISP service or grossly overstates its case when it comes to Redwood's experience.

3. Redwood is certificated as an incumbent local exchange carrier by the Minnesota Public Utilities Commission and (along with its subsidiary Clements Telephone Company) provides telephone service and High Speed Internet via DSL to thousands of customers in eleven exchanges in southwestern Minnesota. Redwood also provides wireless Internet access service to more than 600 customers in and around the following Minnesota locations; Sleepy Eye, Renville, Lamberton, West of Redwood Falls, Morgan, Olivia, Lucan, Gibbon, Hanley Falls, Cottonwood, and Fairfax, Minnesota.

4. In its service territory, Redwood competes with CenturyLink. Redwood also competes with other providers, including MVTV Wireless. MVTV Wireless provides broadband service throughout much of Redwood's operating territory. MVTV Wireless received a federal government stimulus grant to expand its broadband service to certain portions of Redwood's territory.

5. Redwood provides WISP service to residential users with downlink speeds of both 1 MB and 2 MB. The monthly rate for 1 MB service is \$49.95. The installation fee and site survey charge, where assessed, are \$99 and 25, respectively. This would result in first year costs (were all the non-recurring charges allocated to the first year) of \$723.40. Typically, however, in Redwood's experience, subscribers commit to a two-year plan and have their installation fee and site survey charge waived. Thus, the total first year costs for a subscriber typically are \$599.40, 17% lower than the calculation above.

6. Customers choosing 2 MB downlink speeds pay a higher monthly rate.

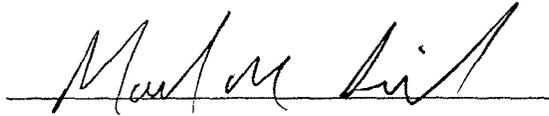
7. There are no monthly or other data caps imposed on Redwood WISP customers regardless of downlink speed.

8. I have reviewed the Petition of CenturyLink. In the Petition and Exhibit B, CenturyLink indicates that it seeks a waiver in an unspecified area served by Redwood in which it says there are 113 affected CenturyLink Living Units. Beyond this description, CenturyLink does not identify the geographic area within Redwood's service territory in which it seeks a waiver of the Commission's Rules. Redwood's offers WISP service in a territory which includes substantially more than 113 residential units that fall within CenturyLink's operating territory. As a result, it is impossible for Redwood to ascertain the precise location in which CenturyLink seeks a waiver.

9. To the extent that CenturyLink implies in the Petition that Redwood's WISP service is affected by line-of-sight issues, Redwood's experience does not support this claim. Redwood's service territory consists mostly of plains and rolling hills. It is true that line-of-sight is required for fixed wireless service and, for this reason, a site survey is done for every new subscriber. But it is rare that a prospective customer is turned away because the site survey reveals insurmountable line-of-sight issues. Indeed, checking the records of Redwood, this occurs in fewer than 2% of cases.

10. CenturyLink suggests that congestion issues are typical for WISP service providers. To date, Redwood has not experienced such congestion problems on its network. It has been able to provide the 1 MB or 2 MB downlink speeds as advertised to its subscribers. After a reasonable search within Redwood, I was unable to find that Redwood has received subscriber complaints that it is failing to provide advertised downlink speeds.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Mark Birkholz", is written over a horizontal line.

Mark Birkholz

July 12, 2012