

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

| | | |
|--|---|---------------------|
| In the Matter of |) | |
| |) | |
| Wireline Competition Bureau Seeks Comment |) | |
| on Areas Shown as Unserved on the National |) | WC Docket No. 10-90 |
| Broadband Map for Connect America Phase I |) | |
| Incremental Support |) | |
| |) | |

To: The Commission
Chief, Wireline Competition Bureau

**COMMENTS OF
FIRST STEP INTERNET, LLC**

First Step Internet, LLC (“FSI”), pursuant to Sections 1.415 and 1.419 of the Commission’s Rules, hereby submits Comments in response to the recent Public Notices issued in this proceeding, which seek comment on a list of “potentially unserved” census blocks in price cap areas for purposes of Connect America Fund (“CAF”) Phase I incremental support.¹ As described below, the list published by the Wireline Competition Bureau (“Bureau”) understates the coverage areas of FSI’s broadband services, which have advertised speeds of at least 3 Mbps downstream and 768 kbps upstream. Accordingly, FSI urges the Bureau to remove the census blocks listed in Attachment A from the Bureau’s list.

¹ See *Wireline Competition Bureau Seeks Comment on Areas Shown as Unserved on the National Broadband Map for Connect America Phase I Incremental Support*, Public Notice, WC Docket No. 10-90, DA 12-1961 (Wireline Comp. Bur., Dec. 5, 2012); see also *Wireline Competition Bureau Updates the List of Potentially Unserved Census Blocks in Price Cap Areas and Extends the Deadline for Comment on the List*, Public Notice, WC Docket No. 10-90, DA 12-2001 (Wireline Comp. Bureau, Dec. 10, 2012) (“*Public Notices*”).

Background

FSI is a facilities-based, regional Internet Service Provider that has been providing Internet access services since 1994. FSI began offering dial-up Internet access with the idea of making Internet access available to virtually everyone in FSI's service areas. FSI enabled the communities of the Inland Pacific Northwest to take advantage of the new opportunities arising in e-commerce. FSI services have evolved to include fixed broadband Internet access services to customers in central Washington and in Idaho. To help advance this effort, FSI obtained Round 1 Broadband Technology Opportunities Program funding for regional broadband network services in Latah, Clearwater, Nez Perce, Lewis and Idaho counties.

FSI provides a variety of fixed terrestrial broadband services, including dial up, DSL, fiber, cable Internet and fixed wireless broadband services. FSI works diligently to collect analyze and regularly update data about broadband coverage to FSI customers. FSI timely reports mapping data to the relevant state mapping authorities: the Washington State Department of Commerce and LinkIDAHO. FSI has participated actively in each state's broadband mapping efforts since at least July 2010. FSI also provided data to Washington and Idaho state mapping authorities for the most recent collection on June 30, 2012 and is now reviewing the maps for Round 7 of each state's broadband mapping initiative. In light of these efforts, FSI is well aware of the contours of its service area and the census blocks that it serves.

Correctly identifying and defining geographic areas of available broadband service are critical to advancing the goals of the National Broadband Map and the CAF.² The FCC’s transitional CAF Phase I support mechanism would provide up to \$300 million in subsidies to promote broadband deployment to “unserved” areas, as designated on the National Broadband Map.³ On November 19, 2012, the Commission directed the Bureau “to publish a list of eligible census blocks shown on the current version of the National Broadband Map as unserved by fixed terrestrial broadband with an advertised speed of 3 Mbps downstream and 768 kbps upstream.”⁴ The Public Notices seek comment on a list of “potentially unserved” census blocks (the “Census Block List”) that potentially would be eligible for CAF Phase I incremental support.⁵ The Bureau links to a map that identifies areas “as unserved by fixed broadband with advertised speeds of 3 Mbps downstream and 768 kbps upstream, using the current version of the National Broadband Map and data as of December 31, 2011.”⁶ The Bureau has been directed to seek comment on areas where coverage is either overstated or understated and to seek comment on areas listed as unserved on the map that are served through the Broadband Initiatives Program or the Broadband Technology Opportunities Program.⁷ The

² See *American Recovery and Reinvestment Act of 2009*, Pub. Law 111-5 (Feb. 17, 2009) at §6001(l) (requiring the National Telecommunications and Information Administration’s Assistant Secretary “to develop and maintain a comprehensive nationwide inventory map of existing broadband service capability and availability in the United States that depicts the geographic extent to which broadband service capability is deployed and available from a commercial provider or public provider throughout each State.”)

³ Eligible price cap carriers accepted approximately \$115 million of these funds, and the Commission is accepting public comment on alternative proposals for distributing this funding. See *Connect America Fund*, Further Notice of Proposed Rulemaking, WC Docket No. 10-90, FCC 12-138 (rel. Nov. 19, 2012) (“Connect America Fund FNPRM”) at ¶¶9, 17-35.

⁴ *Id.* at ¶15.

⁵ The FCC made an updated list of census blocks available at https://github.com/fccdata/unserved_fixed_broadband. First Step used this updated .csv file (which contains 1,030,073 rows) in its analysis.

⁶ See <http://www.fcc.gov/maps/unserved-fixed-broadband> (visited Jan. 9, 2013).

⁷ Connect America Fund FNPRM at ¶15.

Commission has stated that the “most useful comments [on the Census Blocks List] will be those that list specific census blocks that are inaccurately reported on the map, along with a detailed explanation of why the commenter believes the areas are inaccurately reported.”⁸

As described below, based on FSI Internet’s internal study, the Bureau’s list of “potentially unserved” census blocks includes 227 census blocks served by FSI. Accordingly, the list should be amended to exclude these blocks because they are not “potentially unserved.”

Discussion⁹

THE CENSUS BLOCK LIST MUST BE MODIFIED BECAUSE IT UNDERSTATES COVERAGE TO FSI END USER CUSTOMERS IN 227 CENSUS BLOCKS

In response to the Commission’s request for information on “specific census blocks that are inaccurately reported on the map,” FSI submits that the Census Block List identifies 227 census blocks as “unserved” or “partly unserved” where FSI provides customers with broadband service that satisfies the Commission’s performance metrics for speed, latency and capacity.¹⁰ In each of the census blocks listed in Attachment A to these Comments, FSI provides street locations or P.O. boxes information associated with at least one – and in some cases many more – customers with at least one active

⁸ *Id.*

⁹ Attached hereto as Attachment C is the Declaration of Kevin Owen, President of First Step Internet, LLC which certifies the truth of the factual statements presented herein.

¹⁰ The FCC has stated that for CAF Phase I and Phase II, the minimum broadband speed benchmark will be 4 Mbps downstream and 1 Mbps upstream, with sufficiently low latency to enable use of real-time applications such as Voice over Internet Protocol and with usage limits (if any) to be “reasonably comparable to usage limits for comparable broadband offerings in urban areas.” *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; and Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*USF/ICC Transformation Order*”) at ¶¶90-100.

broadband connection that FSI provisions and equips with terrestrial fixed wireless or other fixed broadband services. These customers receive fixed broadband service with advertised speeds of at least 3 Mbps downstream and 768 kbps upstream. Accordingly, FSI requests correction of the Census Block List. In support of the requested corrections, FSI provides the following information:

- a) ***FSI's internal study uses more current data than the data used in the Bureau's Census Block List.***

The Public Notices indicate that the FCC's data set and the Census Block List rely on "the current version of the National Broadband Map and data as of December 31, 2011."¹¹ Since that time, FSI has conducted an internal study of its service areas and, based on this more current information, has determined that the Census Block List understates coverage to FSI fixed broadband customers.

FSI's study methodology, which is described in more detail in Attachment B, relies on periodic review of internal customer databases. Twice a year, on June 30 and December 31, FSI records a snapshot of its customer database and compiles the customer data into various formats for submission to mapping authorities in the states of Idaho and Washington. The data are also submitted to the FCC for FSI's biannual Form 477 reports. The data are collected, compiled and analyzed to determine each FSI customer's FIPS, Census Tract and Census Block, based on 2010 Census Data. Thereafter, FSI cross-checked this list against the FCC's Census Block List and determined which Census Blocks on the FCC's list actually receive service from FSI. The map in Attachment B uses polygons to describe these areas. FSI uses the same methodology to submit mapping information to the state mapping entities in Idaho and Washington State.

¹¹ See *supra* at n. 6.

In particular, the results reported in Attachment A are based on customer data as of December 31, 2012 – data compiled a full year after the data used to generate the Census Block List.

b) *The Bureau’s Census Block List understates coverage to census blocks served by FSI*

Based on the internal analysis, the Census Block List understates coverage for FSI’s existing customers. FSI’s analysis shows that a total of 227 census blocks on the Census Block List actually have FSI customers. At Attachment A, FSI has listed all Census Blocks where according to FSI’s analysis one or more FSI customers actually receive service as of December 31, 2012. A map of these census blocks appears at Attachment B. The list identifies the relevant census block by FIPS number, the street name associated with that customer location or post office box, along with the city name, state and zip code of that location. While some blocks have multiple end-user customers, only a single location is provided in the Attachment for purposes of customer confidentiality. All of these census blocks receive terrestrial fixed wireless broadband service from FSI, with advertised speeds in excess of the FCC’s stated performance metrics.

The data show that FSI broadband service is available to customers in census blocks listed as “unserved” or “partially unserved” in the Census Block list. In addition, provided that customers reside in areas predicted to receive service via an RF propagation study, FSI generally can make broadband service available to end users within these census blocks within a typical service interval without an extraordinary commitment of

resources.¹² To the extent that any of these areas are located in Latah, Clearwater, Nez Perce, Lewis and Idaho counties, they may be included within FSI's BTOP funding areas.

Conclusion

For the reasons set forth herein, FSI requests that the Bureau revise its list of "potentially unserved" census blocks, as identified in the Public Notices, to delete the census blocks identified in Attachment A. All of these census blocks in price cap areas receive broadband service from FSI that exceeds the performance standards of Phase I of the Connect America Fund.

Respectfully submitted,

January 9, 2013

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¹² See *State Broadband Data and Development Grant Program*, 74 Fed. Reg. 32545, 32548 (defining broadband service as "available" to an end user address for purposes of the Recovery Act and the National Broadband Map if "a broadband service provider does, or could, within a typical service interval (7 to 10 business days) without an extraordinary commitment of resources, provision two-way data transmission to and from the Internet with advertised speeds of at least 768 kilobits per second (kbps) downstream and at least 200 kbps upstream to the end user at the address.").

**“Potentially Unserved” Census Blocks that
Are Served by First Step Internet, LLC**

| Number | Census Block | Road Address | City | State | Zip |
|---------------|---------------------|--|-------------|--------------|------------|
| 1 | 160099400001076 | Old Tensed Rd | St Maries | ID | 83861 |
| 2 | 160099400001077 | Tyler Rd | Plummer | ID | 83851 |
| 3 | 160099400001079 | Hangman Creek Rd | Tensed | ID | 83870 |
| 4 | 160099400004043 | Hells Gulch Rd | St Maries | ID | 83861 |
| 5 | 160359400001002 | Brown Rd | Lenore | ID | 83541 |
| 6 | 160359400001008 | Yenni Rd | Kendrick | ID | 83537 |
| 7 | 160359400001014 | Newman Rd | Cavendish | ID | 83541 |
| 8 | 160359400001027 | South Rd | Lenore | ID | 83541 |
| 9 | 160359400001045 | Cavendish Hwy | Lenore | ID | 83541 |
| 10 | 160359400002006 | Eureka Ridge Rd | Orofino | ID | 83544 |
| 11 | 160359400002052 | Eureka Ridge Loop | Orofino | ID | 83544 |
| 12 | 160359400003003 | Eureka Ridge Rd A Upper Fords Creek Rd | Orofino | ID | 83544 |
| 13 | 160359400005025 | Upper Fords Crk Rd | Orofino | ID | 83544 |
| 14 | 160359400005050 | Upper Fords Creek Rd | Orofino | ID | 83544 |
| 15 | 160359400005053 | Laudenbach Rd | Orofino | ID | 83544 |
| 16 | 160359400006013 | Canyon Cr Rd | Orofino | ID | 83544 |
| 17 | 160359400006043 | Praest Rd | Orofino | ID | 83544 |
| 18 | 160359400006047 | Dent Bridge Rd | Orofino | ID | 83544 |
| 19 | 160359701002446 | Loseth Rd | Orofino | ID | 83544 |
| 20 | 160359701002448 | Harmony Heights | Orofino | ID | 83544 |
| 21 | 160359701002476 | Upperfords Crk Rd | Orofino | ID | 83544 |
| 22 | 160359701002629 | Highway 11 | Weippe | ID | 83553 |
| 23 | 160359701003009 | Wilson Creek Rd | Weippe | ID | 83553 |
| 24 | 160359701003021 | Dairy Rd | Weippe | ID | 83553 |
| 25 | 160359701003035 | Old Dent Rd | Orofino | ID | 83544 |
| 26 | 160359701004627 | Old Dent Rd | Orofino | ID | 83544 |
| 27 | 160359701004628 | Freeman Cr Rd | Kendrick | ID | 83537 |
| 28 | 160359701004657 | Main St | Elk River | ID | 83827 |
| 29 | 160359701004761 | Grangeville Salmon Rd | Grangeville | ID | 83530 |
| 30 | 160499602004100 | 95 S | Grangeville | ID | 83530 |
| 31 | 160499602005319 | Moughmer Pt Rd | Cottonwood | ID | 83522 |
| 32 | 160499603002050 | P.O. Box | Cottonwood | ID | 83522 |
| 33 | 160499603002105 | P.O. Box | Cottonwood | ID | 83522 |
| 34 | 160499603002179 | Tolo Trail | Moscow | ID | 83843 |
| 35 | 160570051002000 | Timber Ln | Moscow | ID | 83843 |
| 36 | 160570051002006 | Terra Dr | Moscow | ID | 83843 |
| 37 | 160570051002014 | Compton Ct | Moscow | ID | 83843 |
| 38 | 160570051002023 | | | | |

Attachment A

| Number | Census Block | Road Address | City | State | Zip |
|--------|-----------------|--------------------|------------|-------|-------|
| 39 | 160570051002029 | Estes Rd | Moscow | Id | 83843 |
| 40 | 160570052001002 | Showalter Rd | Moscow | ID | 83843 |
| 41 | 160570052001005 | Frink Rd | Moscow | ID | 83843 |
| 42 | 160570052001015 | W Twin Rd | Moscow | ID | 83843 |
| 43 | 160570052001024 | Foothill Rd | Moscow | ID | 83843 |
| 44 | 160570052001037 | Darby Rd | Moscow | ID | 83843 |
| 45 | 160570052001039 | Crumarine Loop | Moscow | ID | 83843 |
| 46 | 160570052001042 | Wallen Rd | Moscow | ID | 83843 |
| 47 | 160570052001045 | Lyon Rd | Moscow | ID | 83843 |
| 48 | 160570052001050 | Robinson Park Rd | Moscow | ID | 83843 |
| 49 | 160570053006000 | Teare Rd | Moscow | ID | 83843 |
| 50 | 160570053006002 | Wallen Rd | Moscow | ID | 83843 |
| 51 | 160570053006032 | Blaine Rd | Moscow | ID | 83843 |
| 52 | 160570054002057 | Jacksha Rd | Moscow | ID | 83843 |
| 53 | 160570055001067 | Quartz Creek Rd | Harvard | ID | 83834 |
| 54 | 160570055001107 | Vale Rd | Harvard | ID | 83834 |
| 55 | 160570055001108 | 5th St | Harvard | ID | 83834 |
| 56 | 160570055001126 | Clanton Ln | Harvard | ID | 83834 |
| 57 | 160570055001135 | Gold Hill Rd | Princeton | ID | 83857 |
| 58 | 160570055001152 | Gold Hill Rd | Princeton | ID | 83857 |
| 59 | 160570055001155 | Lester Ln | Princeton | ID | 83857 |
| 60 | 160570055001168 | Bear Creek Rd | Princeton | ID | 83857 |
| 61 | 160570055001195 | West Hatter Cr Rd | Princeton | ID | 83857 |
| 62 | 160570055001208 | Country Lane | Potlatch | ID | 83855 |
| 63 | 160570055001209 | Bear Creek Dr | Princeton | ID | 83857 |
| 64 | 160570055001218 | Morris Rd | Princeton | ID | 83857 |
| 65 | 160570055001221 | Bear Creek Rd | Princeton | ID | 83857 |
| 66 | 160570055001230 | E Hatter Creek Rd | Princeton | ID | 83857 |
| 67 | 160570055001257 | Guersey Rd Cutoff | Princeton | ID | 83857 |
| 68 | 160570055002019 | Evergreen Rd | Farmington | WA | 99128 |
| 69 | 160570055002046 | Pigeon Hollow Rd | De Smet | ID | 83824 |
| 70 | 160570055002064 | Michael Ln | Potlatch | ID | 83855 |
| 71 | 160570055002068 | E Mtn Home Rd | Potlatch | ID | 83855 |
| 72 | 160570055002079 | E Mountain Home Rd | Potlatch | ID | 83855 |
| 73 | 160570055002081 | Fiscus Rd | Potlatch | ID | 83855 |
| 74 | 160570055002098 | Gold Creek Rd | Potlatch | ID | 83855 |
| 75 | 160570055002119 | Garfield Rd | Potlatch | ID | 83855 |
| 76 | 160570055002123 | Schneider Rd | Potlatch | ID | 83855 |
| 77 | 160570055002132 | Scoville Rd | Potlatch | ID | 83855 |
| 78 | 160570055002135 | Dailey Rd | Potlatch | ID | 83855 |
| 79 | 160570055002139 | Scoville Rd | Potlatch | ID | 83855 |
| 80 | 160570055002169 | N River Rd | Viola | ID | 83872 |

Attachment A

| Number | Census Block | Road Address | City | State | Zip |
|--------|-----------------|------------------------|----------|-------|-------|
| 81 | 160570055002172 | Highway 6 | Potlatch | ID | 83855 |
| 82 | 160570055002174 | Kendall Rd | Potlatch | ID | 83855 |
| 83 | 160570055004000 | Rock Creek Rd | Potlatch | ID | 83855 |
| 84 | 160570055004006 | Hwy 95 | Potlatch | ID | 83855 |
| 85 | 160570055004007 | Flanningan Crk Rd | Potlatch | ID | 83855 |
| 86 | 160570055004013 | Fiedler Rd | Potlatch | ID | 83855 |
| 87 | 160570055004015 | Nicholson Rd | Potlatch | ID | 83855 |
| 88 | 160570055004019 | E Cove Rd | Viola | ID | 83872 |
| 89 | 160570055004032 | S River Rd | Viola | ID | 83872 |
| 90 | 160570055004035 | Alsterlund Ln | Viola | ID | 83872 |
| 91 | 160570055004036 | West Cove Rd | Viola | ID | 83872 |
| 92 | 160570055004039 | Chaney Rd | Viola | ID | 83872 |
| 93 | 160570055004041 | Flannigan Ck Rd | Viola | ID | 83872 |
| 94 | 160570055004045 | S Walker Ln | Potlatch | ID | 83855 |
| 95 | 160570055004051 | Davis Rd | Viola | ID | 83872 |
| 96 | 160570055004054 | Davis Rd | Viola | ID | 83872 |
| 97 | 160570055004063 | Fiedler Rd | Potlatch | ID | 83855 |
| 98 | 160570055004071 | Hall Rd | Viola | ID | 83872 |
| 99 | 160570055004085 | Four Mile Rd | Viola | ID | 83872 |
| 100 | 160570055004094 | Highway 95 | Viola | ID | 83872 |
| 101 | 160570056001071 | P.O. Box | Bovill | ID | 83806 |
| 102 | 160570056001098 | Hwy 8 | Bovill | ID | 83806 |
| 103 | 160570056001115 | Hwy 8 E | Helmer | ID | 83823 |
| 104 | 160570056001117 | Terrace Ave | Deary | ID | 83823 |
| 105 | 160570056001120 | Forks Rd | Deary | ID | 83823 |
| 106 | 160570056001124 | Highway 8 | Deary | ID | 83823 |
| 107 | 160570056001179 | Harris Rd | Deary | ID | 83823 |
| 108 | 160570056001195 | Chuck Wells Rd | Deary | ID | 83823 |
| 109 | 160570056001202 | Texas Ridge Rd | Deary | ID | 83823 |
| 110 | 160570056001205 | Drury Rd | Deary | ID | 83823 |
| 111 | 160570056001206 | East Rd | Deary | ID | 83823 |
| 112 | 160570056002000 | P.O. Box | Deary | ID | 83823 |
| 113 | 160570056002002 | Park St | Deary | ID | 83823 |
| 114 | 160570056002003 | Line St | Deary | ID | 83823 |
| 115 | 160570056002005 | 6th Ave | Deary | ID | 83823 |
| 116 | 160570056002007 | State St | Deary | ID | 83823 |
| 117 | 160570056002011 | Ailor Rd | Moscow | ID | 83843 |
| 118 | 160570056002019 | West Mt Deary Creek Rd | Deary | ID | 83823 |
| 119 | 160570056002026 | S Main St | Deary | ID | 83823 |
| 120 | 160570056002029 | South Ave | Deary | ID | 83823 |
| 121 | 160570056002043 | Division St | Deary | ID | 83823 |

Attachment A

| Number | Census Block | Road Address | City | State | Zip |
|--------|-----------------|-------------------|----------|-------|------------|
| 122 | 160570056002044 | 2nd St | Deary | ID | 83823 |
| 123 | 160570056002051 | 1st Ave | Deary | ID | 83823 |
| 124 | 160570056002062 | 1st Ave | Deary | ID | 83823 |
| 125 | 160570056002063 | 1st Ave | Deary | ID | 83823 |
| 126 | 160570056002065 | First Ave | Deary | ID | 83823 |
| 127 | 160570056002066 | Big Bear Ridge Rd | Deary | ID | 83823 |
| 128 | 160570056002072 | Locust Ln | Deary | ID | 83823 |
| 129 | 160570056002083 | Old Hwy 8 | Deary | ID | 83823 |
| 130 | 160570056002087 | Johnson Rd | Deary | ID | 83823 |
| 131 | 160570056002093 | Elk Meadow Lane | Deary | ID | 83823 |
| 132 | 160570056002100 | Gun Club Rd | Deary | ID | 83823 |
| 133 | 160570056002103 | Dry Creek Rd | Troy | ID | 83871 |
| 134 | 160570056002121 | McKenzie Rd | Troy | ID | 83871 |
| 135 | 160570056003028 | Tamarack Road | Troy | ID | 83871 |
| 136 | 160570056003045 | Tamarack Rd | Troy | ID | 83871 |
| 137 | 160570056003049 | Big Meadow Rd | Troy | ID | 83871 |
| 138 | 160570056003054 | ClayPit Road | Troy | ID | 83871 |
| 139 | 160570056003056 | Pleasant Hill | Troy | ID | 83871 |
| 140 | 160570056004000 | Dry Creek Rd | Troy | ID | 83871 |
| 141 | 160570056004002 | Burnt Ridge Rd | Troy | ID | 83871 |
| 142 | 160570056004006 | Highway 99 | Troy | ID | 83871 |
| 143 | 160570056004025 | Randall Flat Rd | Moscow | ID | 83843 |
| 144 | 160570056004035 | Hendrix Rd | Moscow | ID | 83843 |
| 145 | 160570056004038 | Highway 8 | Troy | ID | 83871 |
| 146 | 160570056004042 | Wallen Rd | Troy | ID | 83871 |
| 147 | 160570056004045 | Brood Rd | Moscow | ID | 83843 |
| 148 | 160570056004050 | Howell Rd | Troy | ID | 83871 |
| 149 | 160570056004054 | Highway 8 | Troy | ID | 83871-9687 |
| 150 | 160570056004057 | Hwy 99 | Troy | ID | 83871 |
| 151 | 160570056004061 | Sumner Rd | Troy | ID | 83871 |
| 152 | 160570056004067 | Sumner Rd | Troy | ID | 83871 |
| 153 | 160570056004071 | Hwy 8 | Troy | ID | 83871 |
| 154 | 160570056004076 | Spence Rd | Moscow | ID | 83843 |
| 155 | 160570056004080 | Canyon Rd | Moscow | ID | 83843 |
| 156 | 160570056004081 | Canyon Rd | Moscow | ID | 83843 |
| 157 | 160570056004089 | Wallen Rd | Troy | ID | 83871 |
| 158 | 160570056004091 | Hwy 8 | Troy | ID | 83871 |
| 159 | 160570057001018 | Three Bear Rd | Kendrick | ID | 83537 |
| 160 | 160570057001038 | Clemenhagen Rd | Kendrick | ID | 83537 |
| 161 | 160570057001044 | McCloud Gulch Rd | Kendrick | ID | 83537 |
| 162 | 160570057001066 | Highway 99 | Troy | ID | 83871 |

Attachment A

| Number | Census Block | Road Address | City | State | Zip |
|--------|-----------------|----------------------|-----------|-------|------------|
| 163 | 160570057001069 | Davidson Rd | Troy | ID | 83871 |
| 164 | 160570057001071 | Wischmeier Rd | Troy | ID | 83871 |
| 165 | 160570057001080 | Highway 3 | Kendrick | ID | 83537 |
| 166 | 160570057001107 | American Ridge Rd | Kendrick | ID | 83537 |
| 167 | 160570057001159 | Cavendish Hwy | Kendrick | ID | 83537 |
| 168 | 160570057001171 | Cedar Ridge Rd | Kendrick | ID | 83537 |
| 169 | 160570057002017 | N Petersen Loop | Moscow | ID | 83843 |
| 170 | 160570057003003 | Danielson Rd | Genesee | ID | 83832 |
| 171 | 160570057003004 | Genesee Troy Rd | Moscow | ID | 83843 |
| 172 | 160570057003009 | Danielson Rd | Genesee | ID | 83832 |
| 173 | 160570057003030 | Old Hwy 95 | Genesee | ID | 83832 |
| 174 | 160570057003041 | Rosenau Rd | Genesee | ID | 83832 |
| 175 | 160570057003044 | Berger Rd | Genesee | ID | 83832 |
| 176 | 160570057003049 | N Beech St | Genesee | ID | 83832 |
| 177 | 160570057003081 | Hwy 95 S | Genesee | ID | 83832 |
| 178 | 160570057003083 | Thorn Creed Rd | Genesee | ID | 83832-9556 |
| 179 | 160619400022000 | Rogers Rd | Craigmont | ID | 83523 |
| 180 | 160699400002031 | Old Melrose Grade Rd | Peck | ID | 83545 |
| 181 | 160699400003052 | Thoral St | Lapwai | ID | 83540 |
| 182 | 160699400003135 | Thorn St | Lapwai | ID | 83540 |
| 183 | 160699400003139 | Thorn St | Lapwai | ID | 83540 |
| 184 | 160699400003140 | Harris St | Lapwai | ID | 83540 |
| 185 | 160699400005027 | Maamin Dr | Lapwai | ID | 83540 |
| 186 | 160699400005064 | Wildrose Grade | Lapwai | ID | 83540 |
| 187 | 160699400005080 | McCormack Ridge Rd | Lapwai | ID | 83540 |
| 188 | 160699400005083 | Sander Grade | Lapwai | ID | 83540-6161 |
| 189 | 160699400005147 | Forsman Ln | Lewiston | ID | 83501 |
| 190 | 160699400005156 | Hilltop Ln | Lewiston | ID | 83501 |
| 191 | 160699602001001 | Plum St | Kendrick | ID | 83537 |
| 192 | 160699602001005 | Chute Rd | Kendrick | ID | 83537 |
| 193 | 160699602001006 | North Rd | Kendrick | ID | 83537 |
| 194 | 160699602001007 | North Rd | Kendrick | ID | 83537 |
| 195 | 160699602001027 | Vincent Rd | Kendrick | ID | 83537 |
| 196 | 160699602001032 | Davis Rd | Kendrick | ID | 83537 |
| 197 | 160699602001033 | Blair Hollow Ln | Kendrick | ID | 83537 |
| 198 | 160699602001035 | Leland Rd | Kendrick | ID | 83537 |
| 199 | 160699602001059 | South Rd | Kendrick | ID | 83537 |
| 200 | 160699603001028 | Becker Rd | Genesee | ID | 83832 |
| 201 | 160699603001033 | Grain Bin Ln | Genesee | ID | 83832 |
| 202 | 160699603001036 | Evans Rd | Genesee | ID | 83832 |

Attachment A

| Number | Census Block | Road Address | City | State | Zip |
|---------------|---------------------|---------------------|-------------|--------------|------------|
| 203 | 160699603001047 | Hatwai Rd | Lewiston | ID | 83501 |
| 204 | 160699603001059 | Basalt Ln | Lewiston | ID | 83501 |
| 205 | 160699603002013 | Shelter Rd | Lewiston | ID | 83501 |
| 206 | 160699603002019 | E Main St | Lewiston | ID | 83501 |
| 207 | 160699603002121 | Bighorn Dr | Lewiston | ID | 83501 |
| 208 | 160699607001005 | Powers Ave | Lewiston | ID | 83501 |
| 209 | 160699607001006 | Tammany Creek Rd | Lewiston | ID | 83501 |
| 210 | 160699607001007 | Waha Road | Lewiston | ID | 83501 |
| 211 | 160699607001008 | Thiessen Rd | Lewiston | ID | 83501 |
| 212 | 160699607001009 | Rosenkrantz Rd | Lewiston | ID | 83501 |
| 213 | 160699607001012 | Tammany Creek Rd | Lewiston | ID | 83501 |
| 214 | 160699607001013 | Five Mile Ln | Lewiston | ID | 83501 |
| 215 | 160699607001020 | Miller Rd | Lewiston | ID | 83501 |
| 216 | 160699607001022 | Homestead Lp | Lewiston | ID | 83501 |
| 217 | 160699607001024 | Llama Lane | Lewiston | ID | 83501 |
| 218 | 160699607001025 | Pheasant Loop Rd | Lewiston | ID | 83501 |
| 219 | 160699607001026 | Powell Rd | Lewiston | ID | 83501 |
| 220 | 160699607001032 | Flat Iron Rd | Lewiston | ID | 83501 |
| 221 | 160699607001041 | Forsman Rd | Lewiston | ID | 83501 |
| 222 | 160699607001047 | Buckboard Lane | Lewiston | ID | 83501 |
| 223 | 160699607001184 | P.O. Box | Lewiston | ID | 83501 |
| 224 | 530039601002061 | Kestrel Dr | Clarkston | WA | 99403 |
| 225 | 530039602004042 | Peola Rd | Clarkston | WA | 99403 |
| 226 | 530039602004046 | Peola Rd | Clarkston | WA | 99403 |
| 227 | 530039602004054 | Silcott Rd | Clarkston | WA | 99403 |

FIRST STEP INTERNET, LLC: TESTING METHODOLOGY

In reviewing the Census Block List and determining which blocks on that list actually receive fixed broadband service that meets the FCC's performance requirements, FSI relied on an internal study and the following methodology.

Twice a year, on June 30 and December 31, FSI records a snapshot of its customer database and compiles the customer data into various formats. Customer data are submitted to the state mapping authorities for Idaho and Washington and to the FCC for their bi-annual Form 477 reports. The data are collected, compiled and analyzed in the following manner:

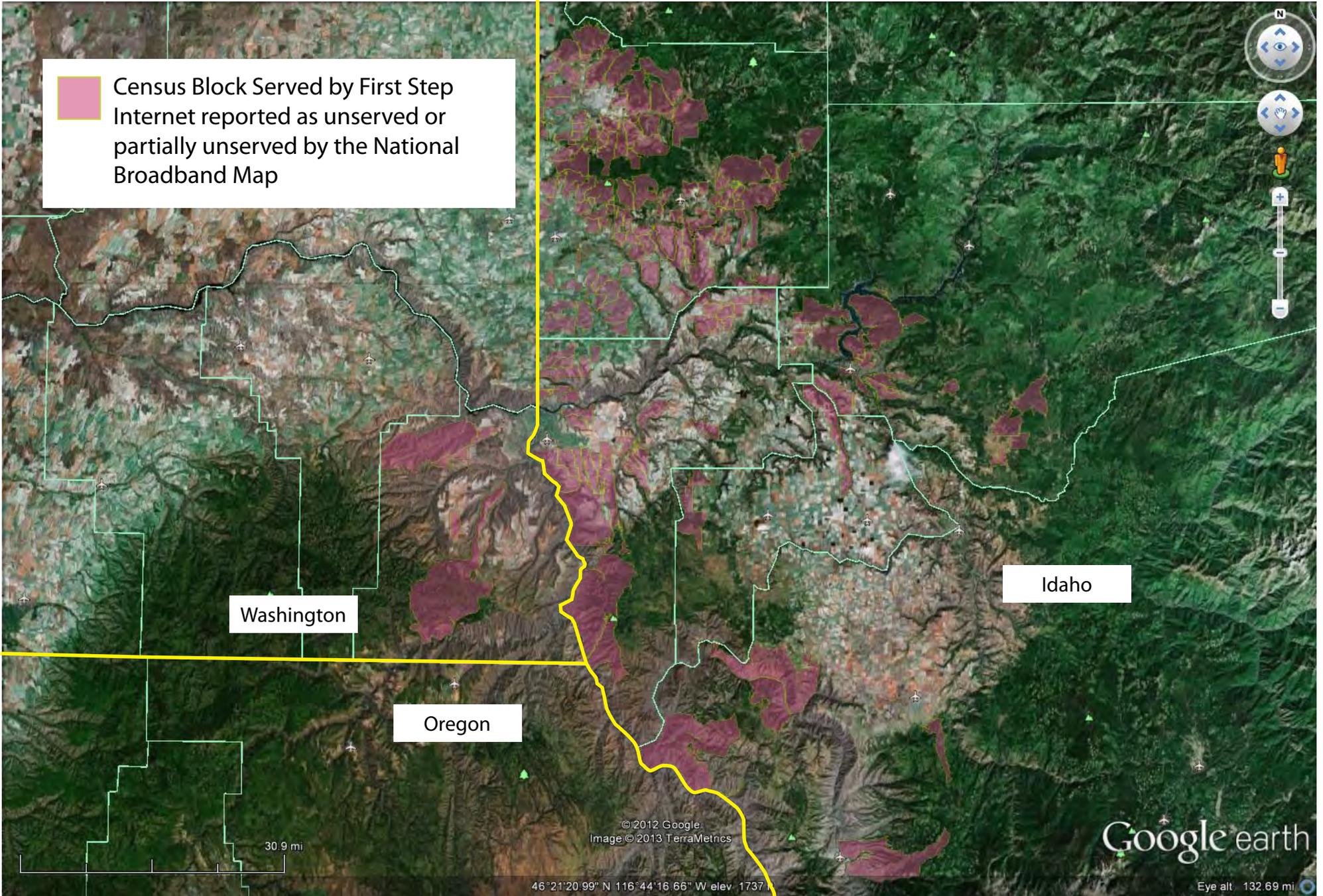
- Twice a year, FSI personnel export the current FSI customer database into an SQL-formatted table that includes the following fields: username, complete address, status, upload speed, download speed, and technology.
- For each record in this customer table, the customer's latitude and longitude is determined using commercially available geocoding methods based on the customer's address. Google Earth is used to determine the coordinates for any customers with addresses that do not resolve to a valid latitude and longitude.
- FSI uses each customer's geographic coordinates to determine their FIPS, Census Tract and Census Block based an FCC Internet-based look-up service. FSI records this data to a dated Subscriber data table using 2010 Census data format.

With respect to the Census Block List, FSI's study proceeded as follows:

- FSI imported the Census Block List into a second SQL database table and used a JOIN DISTINCT SQL query to generate a set of current, FSI broadband customer Census Blocks as compared to the FCC's Census Block List. The result is a DISTINCT set of Census Blocks where FSI has current customers, but the FCC lists as unserved or partially served.
- From a list of Census Block polygons published by the U.S. Census Bureau (TIGER/Line shapefiles), FSI prepared the attached maps, which drew the polygons corresponding to the Census Blocks generated above. These polygons are then imported into Google Earth and then exported as a .kml file. Pink polygons represent Census Blocks on the Census Block List in which FSI has current customers.

A map of the study results follows in this Attachment.

Census Block Served by First Step Internet reported as unserved or partially unserved by the National Broadband Map



Washington

Oregon

Idaho

© 2012 Google
Image © 2013 TerraMetrics

Google earth

Eye alt. 132.69 mi

Declaration of Kevin Owen

I, Kevin Owen, hereby declare under penalty of perjury as follows:

I am the President of First Step Internet, LLC. This Declaration is submitted in support of First Step Internet, LLC's Comments in response to the Public Notices issued in this proceeding, which seek comment on a list of "potentially unserved" census blocks in price cap areas for purposes of Connect America Fund Phase I incremental support. I have read the Comments; all facts set forth therein which are not already subject to official notice are true and correct to the best of my knowledge and belief.

Executed on January 9, 2013



Kevin Owen
President, First Step Internet, LLC

CERTIFICATE OF SERVICE

I, Jonathan Allen, an attorney with Rini O’Neil, PC, hereby certify that I have caused copies of the foregoing “Comments of First Step Internet, LLC” to be sent via email this 9th day of January, 2013, to:

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/s/ Jonathan E. Allen
Jonathan E. Allen