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VIA COURIER AND ECFS

August 20, 2013

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

Re: *Connect America Fund*, WC Docket No. 10-90
Election of 2013 Connect America Fund Phase I Incremental Support

Dear Ms. Dortch:

Windstream Corporation, on behalf of its incumbent local exchange carrier affiliates (hereinafter “Windstream”), is very pleased to elect to accept the \$60,404,310 in incremental support allocated to it for 2013 under Phase I of the Connect America Fund (“CAF”). In addition, Windstream elects to accept \$63,538,965 above its initial allocation, for a total election of \$123,943,275.¹

As intended, CAF Phase I funding will provide an immediate boost to broadband deployment and will bring robust speeds to consumers who do not currently have it. With this support, Windstream intends to deploy broadband meeting the Commission’s standards to 217,638 locations—18,855 locations that are currently unserved by fixed, terrestrial Internet access with minimum speeds of 768 kbps downstream and 200 kbps upstream, and 198,783 locations that lack 3 Mbps/768 kbps Internet access.

Windstream makes its elections above the allocated \$60,404,310 conditionally as permitted by the Commission,² and Windstream’s ability to utilize the support in excess of its

¹ See *Connect America Fund*, WC Docket No. 10-90, Report and Order, at para. 11 (rel. May 22, 2013) (*CAF Phase I Order*) (stating that “a carrier may also elect to receive an amount above its allocated incremental support, up to the total budget of \$300 million for this second round of Phase I. . . . If the total demand of all carriers exceeds \$300 million, we authorize up to an additional \$185 million in funding.”).

² See *id.* at para. 11, fn.30.

allocation will be dependent on the results of the forthcoming challenge process and whether such results alter the economic viability of particular deployment projects.

Attachment 1 to this Election—submitted to the Commission on CD-ROM and in PDF format for the ECFS filing—is an .xls file identifying, by 2010 Census Block FIPS code and wire center CLLI code, the locations where Windstream intends to deploy broadband service in satisfaction of the Commission’s requirements. Included in this file are locations in census blocks that are shown on the sixth version of the National Broadband Map (data as of June 2012) as served with broadband by a provider other than Windstream. In these census blocks and locations, which are clearly delineated on Attachment 1, Windstream hereby challenges the National Broadband Map classification as served.³

The evidence in support of these challenges is a signed certification from Anthony W. Thomas, Chief Financial Officer of Windstream, that Windstream’s analysis shows that it did not port a telephone number used to serve a Windstream customer who also subscribed to broadband in the census block to a provider other than Windstream during the period December 1, 2011 through May 31, 2013.⁴ This certification, as well as other certifications required by Section 54.313(c) of the Commission’s rules, is Attachment 2 to this document. Attachment 3 is a Declaration by Christopher B. Raper, Windstream’s Vice President – Consumer Analytics, intended to describe the manner in which Windstream conducted the above-referenced analysis.

Please feel free to contact me if you have any questions or need any more information.

Sincerely yours,

/s/ Eric N. Einhorn

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³ See *id.* at paras. 31-32.

⁴ See *id.* at para. 33, fn.68 (noting that “a complete lack of number porting to a number of census blocks over a sufficiently long time period would ... bring into question whether the cable company or WISP is actually offering broadband in that area”).

cc: Amy Bender
Ryan Yates
Alex Minard
USAC
Alabama Public Service Commission
Arkansas Public Service Commission
Florida Public Service Commission
Georgia Public Service Commission
Iowa Utilities Board
Kentucky Public Service Commission
Missouri Public Service Commission
Mississippi Public Service Commission
North Carolina Utilities Commission
Nebraska Public Service Commission
New Mexico Public Regulation Commission
New York Public Service Commission
Public Utilities Commission of Ohio
Oklahoma Corporation Commission
Pennsylvania Public Utility Commission
South Carolina Public Service Commission
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Choctaw Nation of Oklahoma
Comanche Nation
Fort Sill Apache Tribe of Oklahoma
Jicarilla Apache Nation
Kaw Nation
Kickapoo Tribe of Oklahoma
Kiowa Indian Tribe of Oklahoma
Seneca Nation of New York
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Muscogee (Creek) Nation