SILVER STAR COMMUNICATIONS

A MATTER OF PUBLIC INTEREST

47 C.F.R. § 1.3 "Any provision of the rules may be waived by the Commission on its own motion or on petition if good cause therefore is shown."

Background:

September 2012 – Silver Star filed an Expedited Waiver Request demonstrating, the insufficiency of ESRI Street Map data being used in the quantile regression analysis to calculate road miles and crossings in its two study areas and asking the FCC to make corrections to the erroneous data.

January 2013 – Silver Star amended its request and asked the FCC to use US Census Bureau TIGER/line data to calculate road miles and crossings after concluding that ESRI data "is grossly inaccurate for Silver Star" and providing aerial maps of the service area that show whole subdivisions missing from ESRI data.

May 2013 – The WCB denied Silver Star's request stating that it failed to demonstrate the superiority of TIGER data, pointing to a single alleged error and stating that Silver Star was using an earlier version of ESRI, instead of version 10.0 which the WCB indicated it is using.

June 2013–Silver Star files an Application for Review using ESRI 10.0 to show that this version is also grossly inaccurate as it relates to road miles and road crossings in Silver Star's service area.

Petition for Waiver Road Mile Data			
	FCC Data	TIGER/Line	Difference
Wyoming	651.31	960.73	48%
Idaho	2,058.83	3,513.87	71%

Petition for Waiver Road Crossing Data			
	FCC Data	TIGER/Line	Difference
Wyoming	2,378	5,467	130%
Idaho	7,010	19,114	173%

Public Interest:

Correcting this data error in Silver Star's service area will have **$0 impact on the HCLS** fund in 2012, 2013 and 2014. Meaning no other RLEC will be negatively impacted by this change.

298 subdivisions served by Silver Star are missing in whole or in part from the ESRI. Accurate data will ensure fair treatment of Silver Star and the customers it serves going forward.

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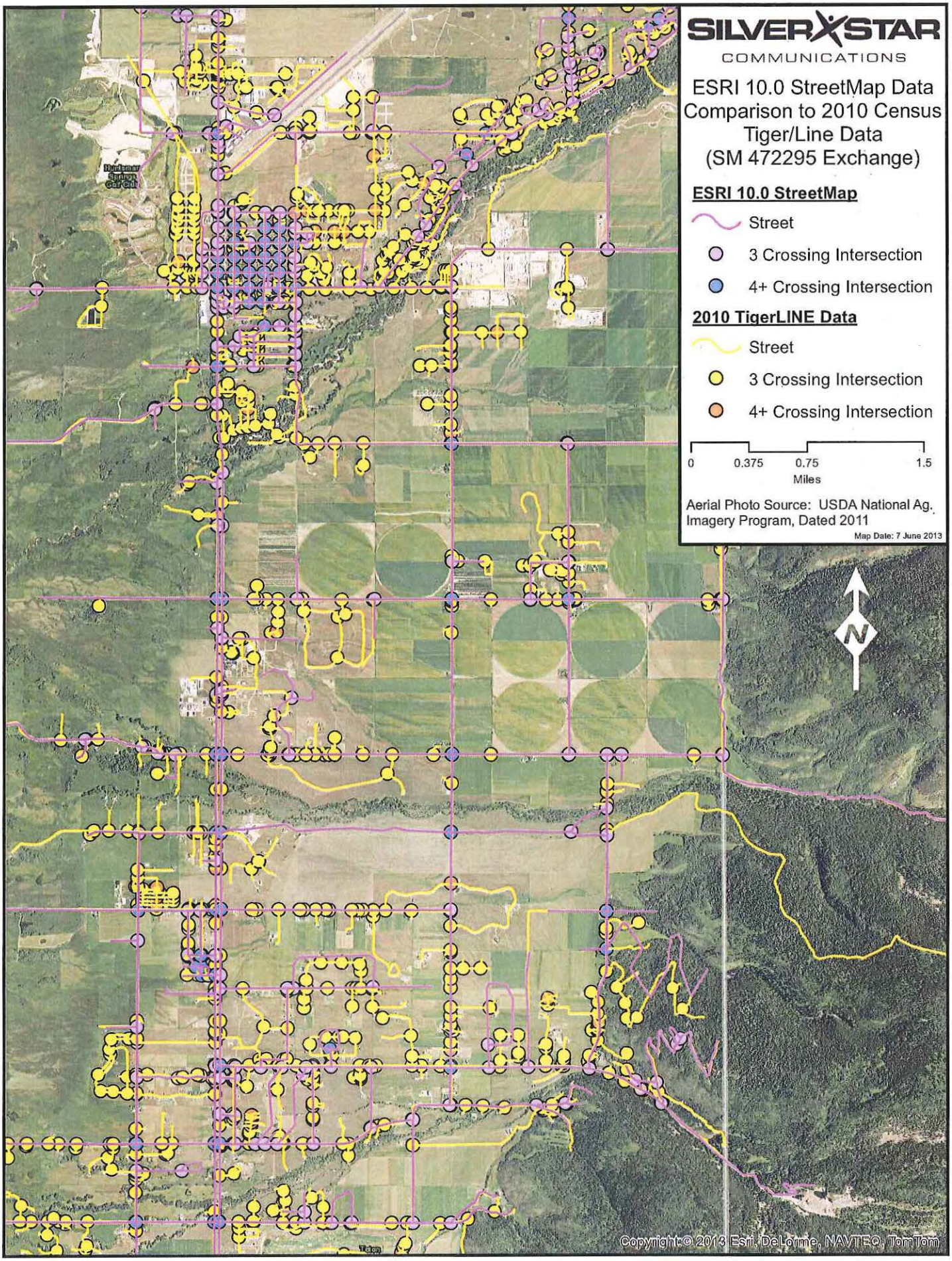
SILVERXSTAR
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ESRI 10.0 StreetMap Data
Comparison to 2010 Census
Tiger/Line Data
(SM 472295 Exchange)
ESRI 10.0 StreetMap
Street
3 Crossing Intersection
4+ Crossing Intersection
2010 TigerLINE Data
Street
3 Crossing Intersection
4+ Crossing Intersection
0
0.375
0.75
1.5
Miles
Aerial Photo Source: USDA National Ag. Imagery Program, Dated 2011
Map Date: 7 June 2013
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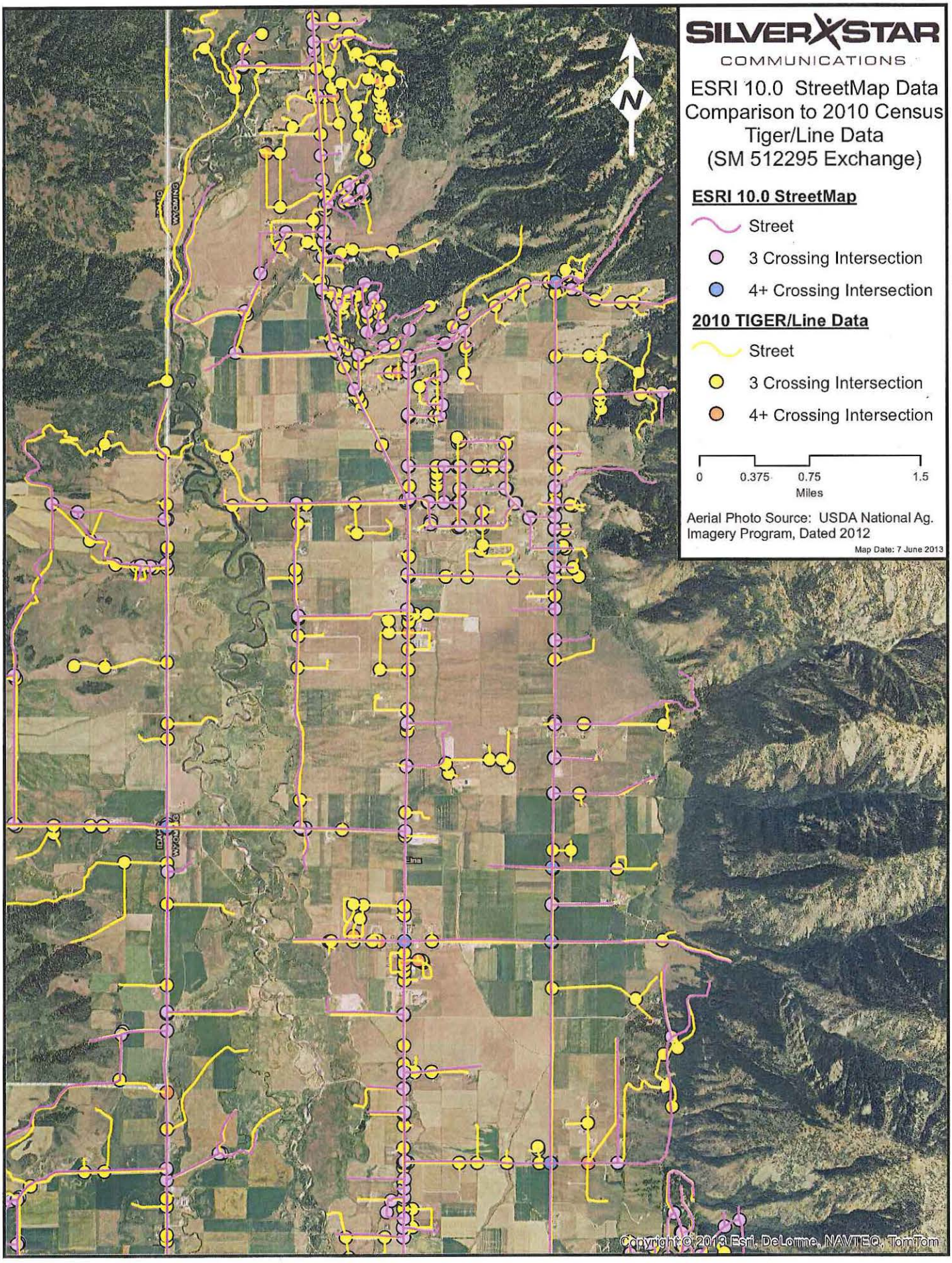
SILVERXSTAR
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