



September 25, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Attention: Chief, Wireline Competition Bureau

**Re: WC Docket No. 10-90  
Challenge to Windstream's Request for Connect America Fund Phase I (Second Round)  
Support**

Dear Ms. Dortch,

Hill Country Telecommunications, LLC (HCT) or the "Company" hereby files this challenge to Windstream's request to receive support in the second round of the Connect America Fund Phase I ("CAF Phase I Round 2") to provide broadband service to locations within the enclosed list of census blocks. HCT currently provides broadband service at or above 3 Mbps download, 768 kbps upload in the census block(s) identified on the attached list, and the Company respectfully requests that the Wireline Competition Bureau take into consideration the evidence provided herein as it makes its final determinations about which census blocks are ultimately eligible to receive CAF Phase I Round 2 support.

On August 28, 2013, the Federal Communications Commission ("FCC") released a Public Notice (DA 13-1832) which instructed interested parties "to challenge price cap carrier's Phase I deployment plans by demonstrating that a block in question is already served by fixed Internet access with the requisite speeds."<sup>1</sup> The Public Notice included a list of all census blocks that the price cap carriers are requesting to receive CAF Phase I Round 2 support to provide broadband. HCT has reviewed this list and identified census blocks in the attached list that should not be eligible for CAF Phase I Round 2 support because the Company already provides broadband in those blocks at a speed of at least 3 Mbps/768 kbps.

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<sup>1</sup> Wireline Competition Bureau Publishes Census Blocks, and Commences Challenge Process, for Second Round of Connect America Fund Phase I, WC Docket No. 10-90, Public Notice, DA 13-1832 (rel. August 28, 2013) ("*August 28 Public Notice*").

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HCT hereby certifies under penalty of perjury that it provides FIBER broadband in the census blocks listed below. HCT understands that Windstream is requesting CAF Phase I Round 2 support in these census blocks because Windstream does not provide broadband at or above 3 Mbps/768 kbps to locations in these census blocks. However, HCT does provide broadband at or above 3 Mbps/768 kbps and the Company is the competitive carrier in the census blocks listed below. The Company offers to make billing records available to the FCC upon request and provides the attached supporting evidence.

HCT urges the FCC to eliminate the census blocks listed below from CAF Phase I Round 2 eligibility.

Respectfully submitted,



Delbert Wilson  
Chief Executive Officer

cc: Ryan Yates, Wireline Competition Bureau, Telecommunications Access Policy Division

Enclosures

## ATTACHMENT A: CENSUS BLOCKS

The following census blocks are identified in the August 28 Public Notice as census blocks that Windstream is requesting CAF Phase I Round 2 support for the deployment of broadband, which Hill Country Telecommunications, LLC (HCT) challenges and urges the FCC to determine that these census blocks are ineligible for CAF Phase I Round 2 support. HCT already provides broadband at or above 3 Mbps/768 kbps within these census blocks.

<b>FIPS</b>	<b>State</b>	<b>Carrier</b>
482659601002030	TX	Windstream
482659607001009	TX	Windstream
482659601002070	TX	Windstream

HCT has facilities in place to provide broadband at or above 3Mbps/768 kbps in these census blocks even though no subscribers have requested service in these areas.

<b>FIPS</b>	<b>State</b>	<b>Carrier</b>
482659601002038	TX	Windstream
482659607001018	TX	Windstream
482659601002035	TX	Windstream
482659607001031	TX	Windstream
482659601002091	TX	Windstream
482659607001056	TX	Windstream
482659601002095	TX	Windstream
482659607003104	TX	Windstream
482659607001025	TX	Windstream
482659601002093	TX	Windstream
482659601002094	TX	Windstream
482659607001061	TX	Windstream
482659607001030	TX	Windstream
482659607003098	TX	Windstream
482659607001013	TX	Windstream
482659607001051	TX	Windstream

## **ATTACHMENT B: SUPPORTING EVIDENCE**

Pursuant to the rules for the challenge process established in the FCC's May 22 Report and Order, "All filings... must be supported by some form of documented evidence." Hill Country Telecommunications, LLC submits as evidence the following supporting documentation:

See attached Map

