

CERTIFICATION

In Support of Armstrong Utilities, Inc.'s Challenge to Certain Price-cap Carrier CAF Phase I, Round 2 Elections

Pursuant to the challenge procedures set forth in 47 C.F.R. §54.312(c), and FCC 13-73, the undersigned certifies under penalty of perjury that Armstrong Utilities, Inc. (“Armstrong”), offers fixed broadband Internet access service of at least 3 Mbps downstream / 768 kbps upstream to current and prospective customers in the census blocks listed in Appendices A, B, C and D (attached hereto).

CENSUS BLOCKS SERVED BY ARMSTRONG

Specifically, the several appendices associated with this certification identify, by FIPs Code, those 353 census blocks where Armstrong offers broadband Internet access of at least 3 Mbps downstream / 768 kbps upstream (“broadband Internet service”) via its cable modem (DOCSIS 3.0) plant and network facilities (“Armstrong’s network”) deployed in these areas. Notably, Armstrong’s broadband Internet service in these areas is capable of delivering speeds significantly greater than the minimum speeds of 3 Mbps / 768 kbps utilized by the Commission.

Although each of the census blocks set forth in the attached appendices are designated as served by Armstrong on the National Broadband Map, a price cap carrier has requested CAF Phase I, Round 2 incremental support for such census block. This certification, and the evidence offered in support, demonstrates that Armstrong does in fact serve these census blocks. Accordingly, each price cap carrier’s request for CAF Phase I, incremental support in such areas should be denied.

ADDITIONAL EVIDENTIARY SUPPORT

The attached appendices set forth several different forms of evidence that Armstrong offers broadband Internet service offerings in the challenged census blocks. Specifically, appendices A, B, C and D attached hereto, provide the following evidence of Armstrong's broadband Internet service offerings in the affected census blocks:

1. Armstrong Subscribers - The number of current Armstrong broadband Internet service subscribers in these census blocks.
2. Homes Passed - The number of "homes passed" by Armstrong's network in the census block. This information reveals the geographic scope of Armstrong's network and quantifies the number of residential units to which Armstrong's network is capable of providing broadband Internet service. This appendix also identifies each of the homes passed in each census block served by Armstrong, and includes geo-coded information for each address which was developed by correlating longitude and latitude for each residential unit identified.
3. Plant Count - This information identifies the number Armstrong network facilities in the census block. The network facilities identified in this metric are either discrete pedestals deployed in the census block, or pole attachment locations in the census block where Armstrong has deployed broadband capable plant. This appendix also identifies each of the specific types of equipment Armstrong has deployed in each census block served by Armstrong, and such information is also geo-coded by correlating longitude and latitude for each piece of equipment.
4. Network Maps - In addition, Armstrong is also providing network maps for each of the census blocks at issue which identify Armstrong subscribers, homes passed and plant.

The evidence in Appendices A, B, and C, respectively, are specific to the census blocks where Windstream, CenturyLink and Frontier have requested CAF Phase I incremental support.

Armstrong's evidence was developed through a process which involved several steps to compile and verify the data attached to this certification. First, the company's employees and vendors pulled the relevant census block data on each of the census blocks identified in the Commission's list of blocks that was published in the August 28, 2013 Public Notice. Second, the company then compared that data to the company's subscriber and homes passed records that reside in the company's billing system. In addition, the company also mapped relevant network facilities (pole and pedestal data) to each of the census blocks at issue, using latitude and longitude information for each of these network facilities. Finally, the company correlated both of those data sets against network maps to validate that the homes identified in these areas are serviceable.

PORTING EVIDENCE IS NOT DETERMINATIVE

The porting evidence offered by Windstream to challenge the National Broadband Map's designation of census blocks served by Armstrong is not persuasive, and does not establish that the census blocks at issue are unserved or underserved. As a threshold matter, the lack of any number porting activity in a particular census block is not indicative of whether broadband service is offered in the census block, and should not be relied upon by the Commission. However, even if the Commission gives such information some weight, the specific evidence that Armstrong provides service in these census blocks that is provided with this certification effectively rebuts Windstream's assertions that those areas are unserved or underserved.

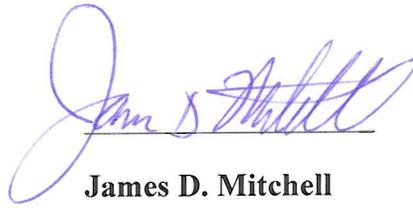
Windstream's assertion that they have not ported telephone numbers in these areas is simply not indicative or determinative of whether Armstrong provides broadband (or voice) service in these areas. As an initial matter, Windstream's evidence is framed very narrowly and

ignores ports from their customers who didn't also purchase broadband service from Windstream.¹

Further, the lack of porting activity may be the result of several factors. First, a percentage of Armstrong voice subscribers use so-called "native" numbers which do not require any porting activity. Second, there are a significant number of Armstrong customers that buy the company's broadband service on a stand-alone basis, without bundling the service with voice services. This occurs for a growing number of consumers who have "cut the cord" in order to rely on mobile voice service providers exclusively, or simply when the consumer wishes to retain plain old telephone service from the incumbent. Regardless of the cause, the lack of porting activity in these census blocks does not establish that these areas are not served by broadband.

To the contrary, the evidence offered with this certification demonstrates that Armstrong serves these census blocks. Accordingly, the Commission should deny the price cap carrier elections to receive CAF support in the census blocks served by Armstrong.

¹ "Windstream did not port a telephone number used *to serve a Windstream customer who also subscribed to broadband* in such [census block] to a provider other than Windstream..." Certification of Anthony W. Thomas on behalf of Windstream Corporation, WC Docket No. 10-90 (filed Aug. 20, 2013).



James D. Mitchell

Vice President - Armstrong Utilities, Inc.

September 25, 2013

APPENDICES

Appendix A – Census Blocks Served by Armstrong with Subscriber Count, Homes Passed and Network Plant Data In Windstream’s CAF Phase I Incremental Support Request

Appendix B – Census Blocks Served by Armstrong with Subscriber Count, Homes Passed and Network Plant Data In CenturyLink’s CAF Phase I Incremental Support Request

Appendix C - Census Blocks Served by Armstrong with Subscriber Count, Homes Passed and Network Plant Data In Frontier’s CAF Phase I Incremental Support Request

Appendix D – Maps of Each Census Blocks Served by Armstrong Showing Subscriber, Homes Passed and Network Plant Locations