



WASHINGTON, DC

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September 27, 2013

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

**Re: Great American Broadband, Inc dba OnlyInternet
Response to CAF Phase I Challenge
WC Docket No. 10-90**

Dear Ms. Dortch:

On behalf of Great American Broadband, Inc. dba OnlyInternet (“GAB”), attached is its response to the challenge filed by Frontier Communications in connection with Phase I of the Connect America Fund.

The response consists of the Declaration of Greg Williams, Vice President and Chief Operating Officer of GAB, and accompanying exhibits thereto. In accordance with guidance from the Wireline Competition Bureau, certain information has been redacted.¹ To the extent the Bureau requires further information or inspection of the redacted information, please contact the undersigned.

Please contact the undersigned if there are any questions or if further information is requested.

Respectfully submitted,

/s/ Stephen E. Coran

Stephen E. Coran

¹ See *Public Notice*, “Wireline Competition Bureau Reminds Connect America Phase I Challenge Participants to Protect Customer Privacy in Challenge Process,” DA 13-1988 (rel. Sept. 26, 2013).

Declaration of Greg Williams

My name is Greg Williams. I am the Vice President and Chief Operating Officer of Great American Broadband, Inc. (“GAB”) dba OnlyInternet, a fixed wireless Internet access provider in rural areas of Indiana and Ohio. I am making this declaration in response to a request for Connect America Fund Phase I support filed by Frontier Communications (“Frontier”) alleging, in part, that GAB does not provide fixed Internet access with speeds of 3 Mbps downstream and 768 kbps upstream in certain census blocks around Uniondale, Indiana. I hereby declare under penalty of perjury that the statements of facts stated in this declaration are true and correct to the best of my knowledge, information and belief.

1. Frontier’s challenge includes a copy of an OnlyInternet web page dated August 15, 2013 stating that GAB offers a broadband package with 3.0 Mbps download speed. According to Frontier, the web page “does not mention an ‘upload’ speed, let alone one of 768 kbps.” On this basis alone, Frontier concludes that GAB “does not offer the requisite broadband speeds.”

2. In fact, in each of the 46 census blocks Frontier lists, GAB does, in fact, offer Internet access service at speeds of at least 3 Mbps download/768 kbps upload. The absence of an upload speed on GAB’s web site does not mean that GAB does not offer upload speeds of at least 768 kbps as part of its 3 Mbps download package. GAB simply elected to not provide that information on its web site. GAB has recently updated its web site to indicate that it offers 768 kbps upload speeds with its 3 Mbps download speed package. A copy of the updated web page is attached hereto as Exhibit A.

3. In addition to the above facts, attached hereto as Exhibit B is a map depicting the census blocks listed on Frontier’s challenge. The areas in red represent the census blocks Frontier has challenged. The red dots indicate the locations of three of GAB’s access points from which it offers 3 Mbps download/768 kbps upload speeds in and around the Uniondale, Indiana census blocks listed by Frontier (these are designated as OIBW-Krinn, OIBW-Mitchell and OIBW-Werling). As can be seen, each subject census block is located in close proximity to an access point. Subscribers and prospective subscribers in these census blocks have the opportunity to subscribe to GAB’s 3 Mbps download/768 kbps upload service.

4. Attached hereto as Exhibit C is a redacted copy of a September 19, 2013 invoice for a GAB subscriber (name and certain other information redacted for privacy and proprietary reasons). This invoice provides the subscriber's address (last two digits redacted) and indicates that the subscriber subscribes to the 3 Mbps download/768 kbps upload package.

5. Based on the foregoing the attached exhibits, the FCC should not approve Frontier's request for CAF Phase I funding in these 46 census blocks.



Greg Williams

September 27, 2013
Date

Exhibit A

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| | | | |
|---|---|---|---|
| <p>Up to 512K download and 128K upload</p> <p>\$24.95</p> <p>Get Started</p> <p>Most basic level of high-speed Internet</p> <p>Suitable for casual web browsing and email</p> | <p>Up to 1.0Mb download and 256K upload</p> <p>\$39.95</p> <p>Get Started</p> <p>Optimized for speed and economy</p> <p>View and download pictures, do online shopping, banking, and research</p> | <p>Up to 2.0Mb download and 512K upload</p> <p>\$54.95</p> <p>Get Started</p> <p>For homes with multiple computers or heavy internet users</p> <p>Watch streaming video, download music, or play online games</p> | <p>Up to 3.0Mb download and 768K upload</p> <p>\$64.95</p> <p>Get Started</p> <p>For those who want only the best</p> <p>Best for watching higher quality video and downloading large files</p> |
|---|---|---|---|

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[Do I need a phone line?](#)

[How much is installation?](#)

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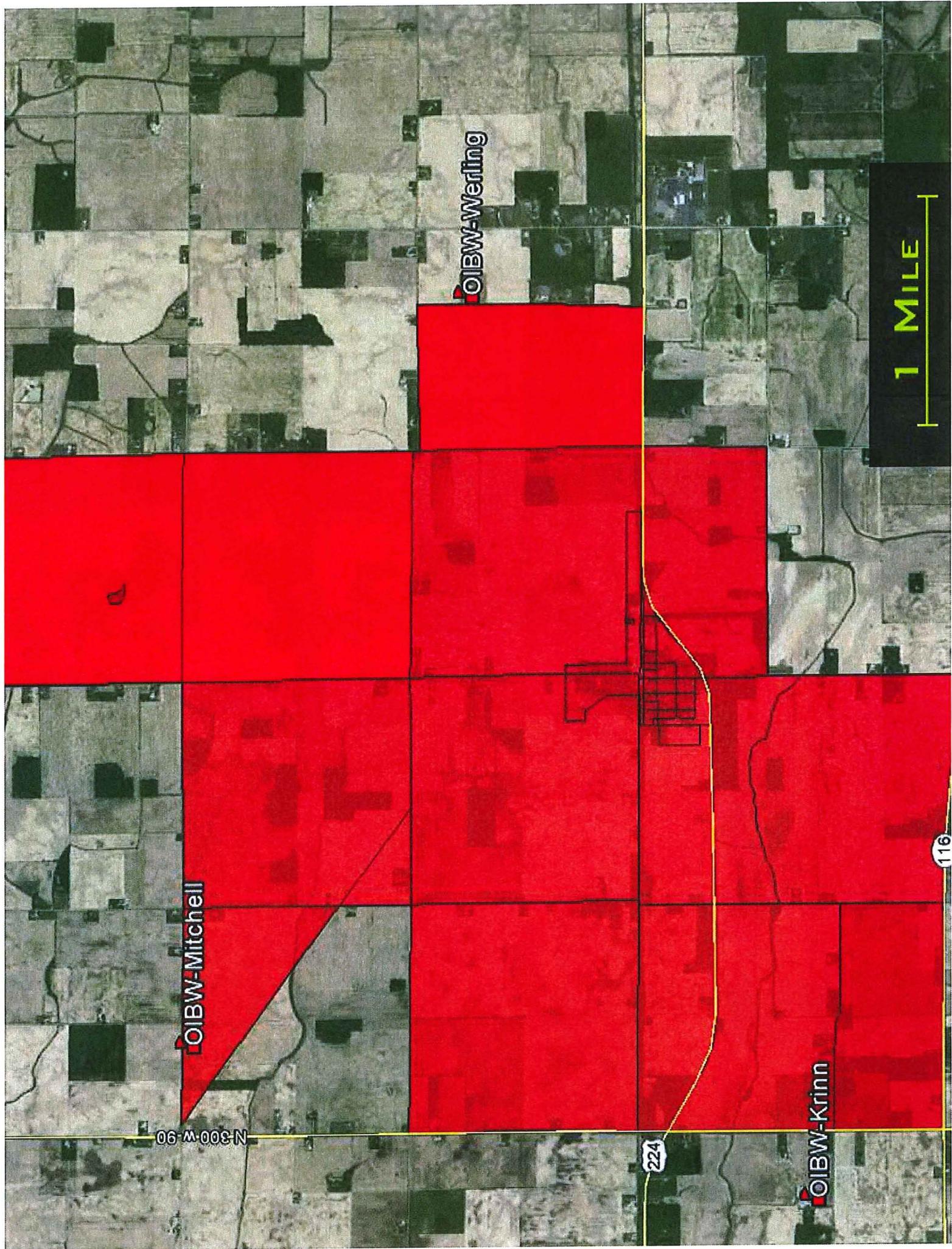
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Exhibit B



OIBW-Mitchell

OIBW-Wering

OIBW-Krinn

1 MILE

N 300 W 90

224

116

Exhibit C

C U S T O M E R I N V O I C E

OIBW - Wireless
360 North Main
Suite G
Bluffton, IN 46714
VOICE: 260-824-9612 FAX:

Statement Generated: 09/19/2013
Account Number: [REDACTED]
Invoice Number: n/a

[REDACTED]
66 N 75 E
Uniondale, IN 46791

Transaction Detail Covering 07/21/2013 - 09/19/2013

| DATE | DESCRIPTION | CHG | TAX | TOTAL |
|------------|--|------------|------------|------------|
| 07/21/2013 | Balance Forward | | | [REDACTED] |
| 08/21/2013 | CHARGE: Wireless 3M/768K Service Name: [REDACTED] from 08/21/2013 to 09/20/2013 Reference Number: [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| 08/21/2013 | [REDACTED] Reference Number: [REDACTED] | [REDACTED] | [REDACTED] | [REDACTED] |
| 08/21/2013 | PAYMENT: [REDACTED] Thank You! | | | [REDACTED] |

[REDACTED]

[REDACTED]

Attention: If you have any questions or concerns about your statement, please contact the Billing Dept. The email address is billing@onlyinternet.net or you may call the office [REDACTED].

You may access your personal BillMax Account by going to [REDACTED]. This will allow you to make payments, set up autopay, or simply view your current and past billing activity. This is simply a convenience