



HIGH-SPEED WIRELESS INTERNET & TELEPHONE

REDACTED COPY

September 27, 2013

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Challenge to Windstream Corporation ("Windstream") Request for Connect America Fund Phase I Support (Second Round) in Iowa State  
WC Docket 10-90**

Dear Ms. Dortch:

I am the Chief Executive Officer for SpeedConnect LLC ("SpeedConnect"), a provider of internet and VoIP services in various markets throughout Iowa. This letter is in response to the Federal Communications Commission ("FCC") issuance of a Report and Order<sup>1</sup> ("Order") and Public Notice<sup>2</sup> ("Public Notice") providing a process to challenge providers who requested funding for the second round of Connect America Phase I for census blocks they have deemed as unserved but which in fact are being served by SpeedConnect.

Windstream has requested such funding for the census blocks listed in Exhibit A hereto. However, such areas are already being actively served by SpeedConnect who provides internet and VoIP service to subscribers in these census blocks through terrestrial fixed wireless-licensed networks. Such services are provided at speeds as high as 10 Mbps downstream and 1.5 Mbps upstream, which are well in excess of the required 3 Mbps downstream and 768 kbps upstream levels needed to challenge funding to competitive providers. As evidence of such service, SpeedConnect has attached the following:

Exhibit B - A map of SpeedConnect's market showing the specific location of various subscribers within such census blocks.

<sup>1</sup> *Connect America Fund*, WC Docket No. 10-90, Report and Order, 28 FCC Rcd 7766 (2013); Order on Reconsideration, 28 FCC Rcd 10488 (2013).

<sup>2</sup> Wireline Competition Bureau Publishes Census Blocks, And Commences Challenge Process, for Second Round of Connect America Phase I, *Public Notice*, DA 13-1832 (rel. Aug. 28, 2013).

<sup>3</sup> SpeedConnect can also provide at FCC request a Geographical Service Area ("GSA") map showing the extent of its services in this market, which was filed by request of the Commission pursuant to Section 27.14(o) of the Commission's Rules mandating that Broadband Radio Service ("BRS") and Educational Broadband Radio Service ("EBS") licensees make a showing of "substantial service" in their GSAs by May 1, 2011. As noted in the Order, if a service provider purports to serve "the entire area with broadband and offers VoIP, it would be reasonable to expect that some of the provider's customers would opt to use that provider's VoIP service." Order at fn. 68

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Exhibit C - A list of subscriber addresses currently served by SpeedConnect, as well as a sampling of invoices sent to such subscribers. Due to the high number of subscribers served and the large attachment that would have resulted in including this information, SpeedConnect did not include a separate invoice for each census block. However, such information can be provided upon FCC request.

Exhibit D - An example of the marketing information used to attract new customers listing SpeedConnect services available and prices offered.

In addition, the FCC already has data on file showing service by SpeedConnect to thousands of customers in these areas at such service speeds through its submission of its bi-annual Form 477 report, the most recent filed on August 29, 2013 (OMB number 3060-0816).

Accordingly, WindStream's request for funding in these census blocks should be denied. Such funds are intended to bring new service to unserved areas and not overbuild existing systems which did not receive government funds to deploy service. SpeedConnect would be irreparably harmed and be unable to compete if such overbuilding occurred as it has relied on private funds and not the use of government funding to finance its networks.

This letter provides certification under penalty of perjury that the information provided herein is true and correct to the best of my knowledge.

Sincerely,

  
John Ogren  
CEO

cc: Ryan Yates (by e-mail [Ryan.Yates@fcc.gov](mailto:Ryan.Yates@fcc.gov))

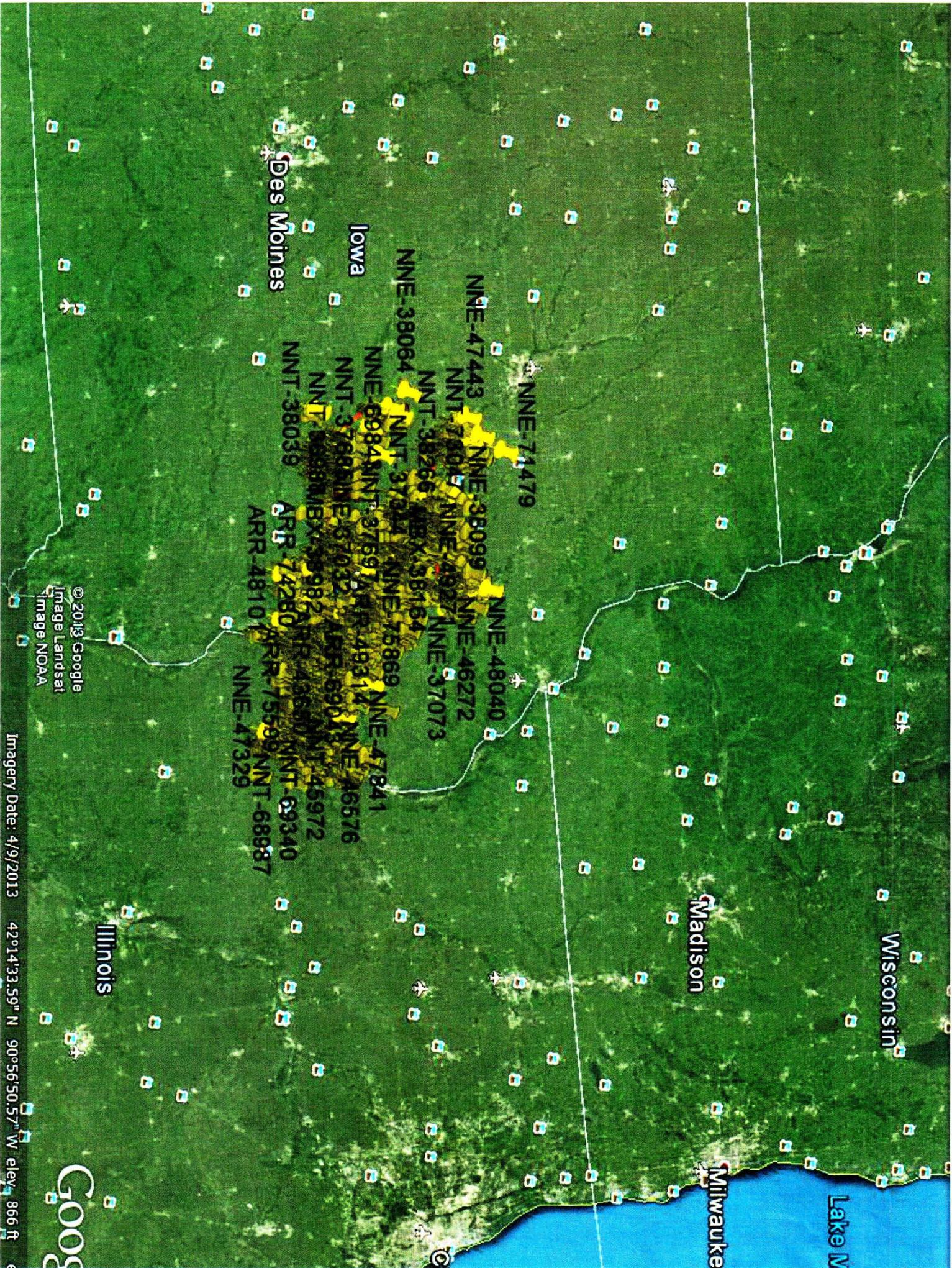
Attachments

**EXHIBIT A****IOWA CENSUS BLOCKS LISTED AS UNSERVED BY WINDSTREAM CORPORATION  
THAT ARE BEING SERVICED BY SPEEDCONNECT**

<b>CITY/COUNTY</b>	<b>Census Block</b>	<b>Windstream Support Requested</b>
Parnell/Iowa	190959604003133	\$1,100.00
Parnell/Iowa	190959604003128	\$550.00
Parnell/Iowa	190959604003171	\$550.00
Parnell/Iowa	190959604003174	\$550.00
Amanas/Iowa	190959601003097	\$550.00
Amanas/Iowa	190959601003081	\$1,650.00
Amanas/Iowa	190959601003200	\$4,950.00
Amanas/Iowa	190959601003075	\$5,500.00
Amanas/Johnson	191030103011024	\$1,100.00
Amanas/Johnson	191030103011024	\$550.00
Tipton/Cedar	190314503003066	\$550.00
Tipton/Cedar	190314503003049	\$1,100.00
Tipton/Cedar	190314503001018	\$550.00
Tipton/Cedar	190314503001017	\$3,300.00
Tipton/Cedar	190314503001016	\$550.00
Tipton/Cedar	190314503001045	\$550.00
Tipton/Cedar	190314503001041	\$1,650.00
Tipton/Cedar	190314503001042	\$2,750.00
Tipton/Cedar	190314503001040	\$1,100.00
Moscow/Muscatine	191390502001085	\$3,100.00
Moscow/Muscatine	191390502005016	\$775.00
Montpelier/Scott	191630104014031	\$11,625.00
Montpelier/Scott	191630104014016	\$775.00
West Davenport/ Scott	191630104022086	\$1,650.00
West Davenport/ Scott	191630104022088	\$1,100.00
West Davenport/ Scott	191630104022101	\$2,200.00
Bettendorf/Scott	191630101023007	\$34,100.00
Leclaire/Scott	191630101023018	\$13,750.00
Leclaire/Scott	191630101023003	\$36,300.00
Leclaire/Scott	191630101023002	\$47,850.00
Leclaire/Scott	1916301010231050	\$550.00
Bettendorf/Scott	191630101023059	\$13,750.00
Bettendorf/Scott	191630101023055	\$550.00

**EXHIBIT B**

**MAP SHOWING LOCATIONS OF SPEEDCONNECT SUBSCRIBERS**



## **EXHIBIT C**

### **SPEEDCONNECT SUBSCRIBER LIST**

**SpeedConnect's subscriber list contains over 1800 customers, making it too voluminous of a document to attach to this filing. Therefore, a cross-section has been provided to indicate the existence of such customers throughout SpeedConnect's service area. A full listing of such customers can be made available to Commission staff upon request.**

**REDACTED COPY. THIS INFORMATION IS CONSIDERED PROPRIETARY AND HAS BEEN OMITTED FROM ALL PUBLIC FILINGS.**

**EXHIBIT D**

**MARKETING MATERIALS**

# SPEEDconnect®

HIGH-SPEED WIRELESS INTERNET & TELEPHONE

## High-Speed Plans

Plan	Features	Price
<b>Platinum</b> Plans	<b>Month-to-Month</b> <b>Unlimited Data</b> \$50 activation fee \$100 installation for outdoor unit Speeds up to 6 to 10 Mb down and 768 k up	<b>\$69.95</b> per month
	<b>2-year Contract</b> <b>Unlimited Data</b> Free pro install if an outdoor unit is necessary Speeds up to 6 to 10 Mb down and 768 k up	<b>\$46.95</b> per month*
<b>Basic</b> Plans	<b>Month-to-Month</b> <b>7GB Data/Month</b> \$50 activation fee \$100 installation for outdoor unit \$2/GB overage fee	<b>\$46.95</b> per month
	<b>2-year Contract</b> <b>7GB Data/Month</b> Free pro install if an outdoor unit is necessary \$2/GB overage fee	<b>\$26.95</b> per month*
<b>Lite</b> Plan	<b>2GB Data/Month</b> No contract necessary \$2/GB overage fee \$150 activation fee	<b>\$19.95</b> per month

\*Introductory rate for the first 12 months. Activation fee and 2-year contract required.

**30-Day Money-Back Guarantee.**

**Iowa**

4 Hawkeye Drive, #101  
North Liberty, Iowa 52317

**319-640-0722**

**866-297-2900 | [speedconnect.com](http://speedconnect.com)**