



HIGH-SPEED WIRELESS INTERNET & TELEPHONE

DOCKET FILE COPY ORIGINAL

ACCEPTED/FILED

SEP 27 2013

Federal Communications Commission
Office of the Secretary

REDACTED COPY

September 27, 2013

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

**Re: Challenge to CenturyLink Request for Connect America Fund Phase I
Support (Second Round) in Idaho 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 Idaho. This letter is in response to the Federal Communications Commission ("FCC") issuance of a Report and Order¹ ("Order") and Public Notice² ("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.

CenturyLink 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 - Maps of SpeedConnect's markets showing the specific location of various subscribers within such census blocks. The first attachment is a state map showing where the three service areas are located within the state. Then there is a separate map of each of the three service areas showing the location of customers in each market, all of which are within the census blocks listed in Exhibit A.³

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

² 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).

³ SpeedConnect can also provide at FCC request a Geographical Service Area ("GSA") map showing the extent of its services in each of these markets, which were 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

Ms. Marlene H. Dortch
September 27, 2013
Page 2

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.

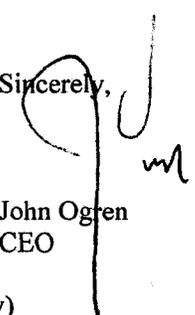
Exhibit D - An example of the marketing information used to attract new customers listing SpeedConnect services available and prices offered.

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, CenturyLink'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)

Attachments

EXHIBIT A

**IDAHO CENSUS BLOCKS LISTED AS UNSERVED BY CENTURYLINK COMMUNICATIONS _____
THAT ARE BEING SERVICED BY SPEEDCONNECT**

CITY/COUNTY	Census Block	Century Link Support \$	SpeedConnect Connection Type
Rexburg/Madison	160659501001052	1100	Wimax
Rexburg/Madison	160659501001056	1650	Wimax
Rexburg/Madison	160659501001014	2200	Wimax
Rexburg/Madison	160659501001009	3850	Wimax
Rexburg/Madison	160659501001051	1100	Wimax
Rexburg/Madison	160659501001050	2200	Wimax
Rexburg/Madison	160659501001048	1650	Wimax
Rexburg/Madison	160659501001253	1100	Wimax
Rexburg/Madison	160659501001062	7150	Wimax
Rexburg/Madison	160659501001063	550	Wimax
Rexburg/Madison	160659501001068	4400	Wimax
Rexburg/Madison	160659501001069	1100	Wimax
Rexburg/Madison	160659501001259	2200	Wimax
Rexburg/Madison	160659501001048	1650	Wimax
Rexburg/Madison	160659501001107	1100	Wimax
Rexburg/Madison	160659501001127	2200	Wimax
Rexburg/Madison	160659501002010	6050	Wimax
Rexburg/Madison	160659501003134	5500	Wimax
Rexburg/Madison	160659501003045	10450	Wimax
Rexburg/Madison	160659501003041	550	Wimax
Rexburg/Madison	160659501001098	9350	Wimax
Rexburg/Madison	160659501001241	550	Wimax
Rexburg/Madison	160659501001080	550	Wimax
Rexburg/Madison	160659501001122	2200	Wimax
Rexburg/Madison	160659501002101	13750	Wimax
Rexburg/Madison	160659501002103	550	Wimax
Rexburg/Madison	160659501002104	7150	Wimax
Rexburg/Madison	160659501001130	58300	Wimax
Rexburg/Madison	160659501001132	67650	Wimax
Rexburg/Madison	160659501001144	3850	Wimax
Rexburg/Madison	160659501001280	5500	Wimax
Rexburg/Madison	160659501001154	2750	Wimax
Rexburg/Madison	160659501001201	1650	Wimax
Rexburg/Madison	160659501001218	775	Wimax
Rexburg/Madison	160659501001221	1100	Wimax

EXHIBIT B

MAPS SHOWING LOCATIONS OF SPEEDCONNECT SUBSCRIBERS

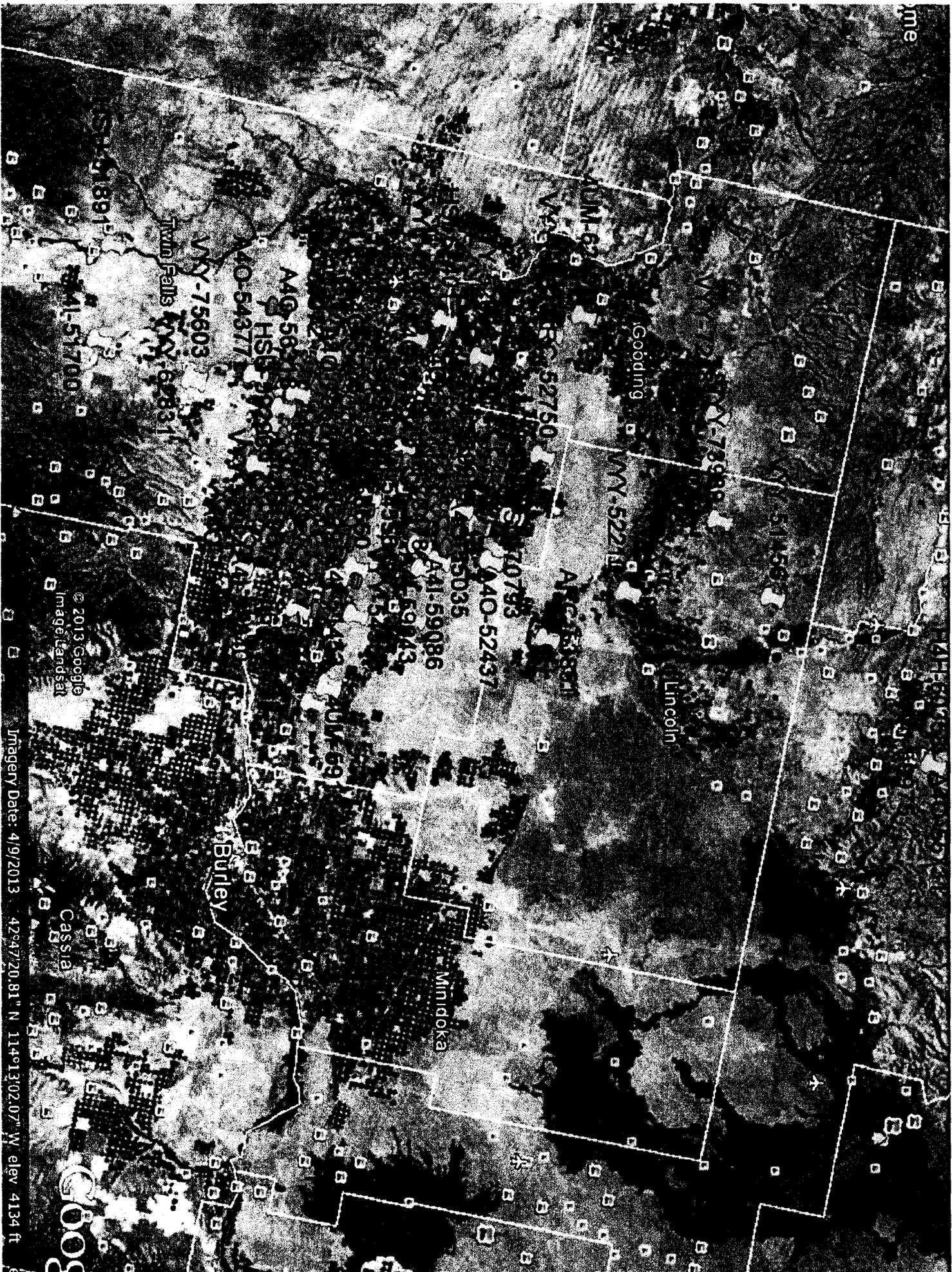


Imagery Date: 4/9/2013 43°54'34.39" N 113°40'51.53" W elev: 7337 ft

©2013 Google
Image Landsat







me

NY-75603
Twin Falls NY-62831
40-54377

MO-56

HSB-7220

52750

Gooding

NY-78999

NY-52211

70793

40-52437

41-59086

41-59043

50035

ARC-15391

Lincoln

MO-59

Burley

Mindoka

Cassia

Imagery Date: 4/9/2013

42°47'20.81" N 114°13'02.07" W elev 4134 ft





Jefferson

Madison

Bonneville

Jonah Butte

AAO57404

AFB

85 A4J 61453

HI 152616

1893

F5U 5174

2013 Google Imagery Landsat

Shelley/Butte

Imagery Date: 4/9/2013

43°41'14.91" N 112°04'18.23" W elev 4785 ft



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

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

30-Day Money-Back Guarantee.

Idaho Falls

1665 N. Woodruff Ave

Idaho Falls, ID 83401

208-529-0184

866-297-2900 | speedconnect.com