Public Notice Submission

Provider Name: Gardonville Cooperative Telephone Association

Summary: Gardonville Telephone Cooperative Association ("Gardonville") is a small rural operator and not for profit communications cooperative that supplies telephone, wireless, internet, and other communications services for the approximate 344 square miles of Douglas County in rural west central Minnesota. Gardonville respectfully requests relief and seeks withdrawal of the enclosed proposed census tracts that fall within the boundaries of Gardonville telephone exchanges. Gardonville serves a number of Douglas County communities and 3,221 subscribers passing an estimated total of 13,500 residences and businesses today. We own and provide fiber optic cable broadband as well as provide wireless broadband services in the 700 MHz (C & B blocks) and 3.65 GHz spectrums that compliment our more rural areas where fixed fiber optic reach is less feasible. Deployment choices between fixed fiber optics and wireless are largely based on geographic and physical location as well as line of site, fiber accessibility, and cost effectiveness. Such methods permit us to offer broadband to 100% of our subscriber base at reasonable cooperative rates that remain competitive with other broadband providers in our area. As such we more than adequately offer and implement broadband and meet the broadband definition of the ARRA and BTOP/BIP stimulus NOFA. In support of our concerns, Connect Minnesota, a broadband service inventory website also clearly displays Douglas County, Minnesota as having broadband availability via fiber, cable, DSL, wireless, and mobile services Gardonville opposes and has concerns relating to the proposed census tracts submitted to BTOP for funding and requests (should these applications be considered viable) that Douglas County, Minnesota be removed from each respective application. Gardonville maintains that since high-speed service and broadband are readily available via their network offerings today that this proposed area was not part of due diligence research required to justify their application for stimulus funding. Therefore, GCTel, in good faith, believes that its service territories, including the enclosed census tract data, does not qualify for BTOP funding.