

Public Notice Submission

Provider Name: Val-Ed Joint Ventures dba 702 Communications

Summary: Val-Ed Joint Venture, LLP dba 702 Communications ("702") is a locally owned and full-service telecommunications operator providing services at competitive rates in and around the Moorhead and greater Minnesota areas. Six member owner telephone companies ("Member Owners") partnered in 1989 to form 702 providing inter-exchange expansion, high capacity, private line, and non-switched services. 702 provides business and residential voice and data services via DSL, DSX, OCX, and Ethernet. In addition, 702 provides wholesale services for bandwidth, long distance, and regional fiber transport where middle-mile fiber facilities have been proposed under the NTIA BTOP program. As a transport company, 702 has access to fiber encompassing much of greater Minnesota extending from the Canadian border southward with Points of Presence (POPs) in East Grand Forks, Bemidji, Moorhead, Fargo, Sioux Falls, Windom, Owatonna, Wadena, and St. Cloud. 702 and its Member Owners specifically object to proposed middle-mile services for the Brainerd to Moorhead, MN fiber route. Along this route today, fiber facilities are already owned and operated by 702 and its partners offering transport and capacity on existing optical networks. 702 is one of at least two existing providers that already offer service for this corridor. The submission of this route as a BTOP qualified area for funding is an inaccurate representation of this area. 702, its Member Owners and other area rural independent telephone exchange carriers already offer broadband connectivity for the enclosed proposed census tracts and broadband services are offered at reasonable rates that remain competitive with other broadband providers throughout central Minnesota. Furthermore, 702's transport division already provides Comprehensive Community Infrastructure (CCI) as defined by NTIA BTOP by way of high-capacity circuits such as T1, T3, and Ethernet over wholly owned fiber facilities. 702 provides these services for major banks, educational institutions, cell providers, local ISPs, and enterprise manufacturing firms as well as independent and incumbent LECs for inter-exchange connectivity. 702 is the managing entity for Aurora Fiber Optic Networks providing high service levels and flexible route diversity covering most of Minnesota. CISCO ONS fiber optic terminals serve the majority of the service locations in this network allowing for a wide line of service offerings from DS1, DS3, OC3, OC12, OC48, Fast Ethernet, and Gigabit Ethernet. Lastly, independent telephone company networks, 702, its Member Owners, and other MN rural telecommunications ILECs offer both middle-mile and last-mile services including Fiber-to-the-Home (FTTH) and broadband connectivity for the rural areas immediately around and reaching far beyond this corridor. These providers have been deeply invested in bringing broadband communications to our rural areas for several years. Therefore, in good faith, it is the belief of 702 and its Member Owners that the proposed Brainerd to Moorhead, MN route and the surrounding areas does not qualify for NTIA BTOP funding. 702 respectfully requests and seeks withdrawal of the enclosed proposed census tracts.