

Public Notice Submission

Provider Name: DCN (Dakota Carrier Network), LLC

Summary: This BTOP Response Form comments on projects that propose to provide services in portions of ND that are currently served with high speed broadband service by the local Telecommunications companies. It refers to the XO Communications Easygrant #5601 and the U.S. UCAN Easygrant #4589. DCN and the local Telcos currently provide high speed fiber optic based transport and Internet Services throughout ND. High Speed Ethernet connections are provided to most Educational locations and State Agencies. DCN's Easygrant #4278 will complete the placement of fiber to all of the remaining Education, State Agencies, Medical and Public Safety sites not currently served on fiber optics. The sites proposed by the XO and U.S. UCAN applications would serve limited areas of ND, most of which currently have access to high speed transport and Internet Services.

There are currently multiple carriers with equivalent fiber routes that provide the services being proposed by XO at price points that are equal or better than those proposed. XO's reference to high Internet pricing in the \$200-\$400/Mb range is unheard of in ND. In addition, there is substantial fiber capacity already established for high speed transport and Internet services. The path XO proposed parallels the fiber path of Sprint, AT&T and 360 Networks and extends out one radio hop from the fiber path at the amplifier locations. There is no provision to complete the path to the anchor locations but presumes that there will be local companies to provide the last mile connectivity. Local companies in ND have existing network connections that make this massive project unnecessary. Funding a single very large project that is unneeded will preclude the acceptance of many worthy projects throughout the country. The U.S. UCAN project will compete with local companies that currently provide connections to education, healthcare and anchor institutions. The application proposes serving "eventually all or virtually all anchors". Taking over the Internet service to over 200,000 anchor institutions is not necessary and will have a significant negative effect on the viability of current telecommunications providers. The claim that commercial networks are congested is not true in ND.

DCN provides broadband connectivity to businesses, education and government entities. As such, there is no data shown for Number of Households With Access or the Number of Households Subscribing to DCN service.

Subsidizing an unneeded major national network is poor use of Recovery Act funding and would do little for the underserved remote rural areas of ND. DCN protests these applications and recommend that they not be funded.