

## Public Notice Submission

**Provider Name:** Santa Rosa Telephone

**Summary:** Santa Rosa Telephone Cooperative, Inc. (SRTC), a rural incumbent and competitive local exchange carrier, appreciates the opportunity to provide comments to NTIA regarding the ARRA applications that appear to be requesting funds to provide middle-mile facilities to provide services to critical community institutions in our service area. We believe applicants are proposing to offer additional middle-mile facilities to an area that already has up to 10-gig of capacity being provided by SRTC. SRTC provides access to broadband services to 100% of its customers with up to 10-gig of middle-mile backhaul capacity. Today all of SRTC's customers, including all critical community institutions, are offered broadband speeds that exceed the broadband definition set forth in the NTIA NOFA. Currently 50% of SRTC's customers take a broadband service offering. The attached advertised rates show customers can obtain a 3 Mbps offering for as little as \$46.95 per month. SRTC was founded by its customers as a cooperative in 1952 and is committed to provide services, including broadband services, to its customers that are comparable in rates and quality to the services provided in urban areas. The SRTC customer data provided as part of these comments show that SRTC offers 3 Mbps to all of its customers. SRTC has invested a considerable amount of capital over the past few years to deploy fiber facilities to end users, medical institutions, public libraries and schools within its service area. High speed services are available today to all community anchor institutions and service centers within SRTC's service area. US OCAN, OCAN, University Corporation for Advanced Internet Development and X-Press Net filed applications in Santa Rosa's service area. Government agencies or government-funded entities should not be allowed to use grant funds to compete with private enterprise. X-Press Net filed in counties where Santa Rosa has deployed fiber to the home. SRTC does not believe inserting another service provider in a rural area with few customers furthers the goals of the ARRA. SRTC requests that any ARRA application that labels its wireline and wireless service areas as Unserved or Underserved, be removed from the application and be considered areas that do not qualify for ARRA grant or loan funding because they are not unserved or underserved. Please contact us if you have any questions.