

Public Notice Submission

Provider Name: Iowa Telecommunications Services, Inc.

Summary: Iowa Telecom has made and continues to make substantial efforts to deploy broadband networks in some of the most rural parts of Iowa. As the Service Tier and Pricing Table shows, Iowa Telecom offers very affordable high-speed broadband services at speeds ranging from 768 kbps (for those households and business that have limited broadband needs) up to 15 Mbps (for those residential, business, and community anchor institution users who require greater bandwidth). Moreover, Iowa Telecom makes available several high-capacity service offerings that enable larger commercial enterprises and community anchor institutions to enjoy speeds of over 1 Gbps. Iowa Telecom's network reaches broadly throughout the State to enable these high-quality service offerings. Indeed, as the confidential data herein show in more detail, Iowa Telecom provides residential broadband service of up to 15 Mbps to nearly 1/3 of the census tracts that are the subject of Round 2 BTOP applications in Iowa, and speeds of up to 3 Mbps are available to residential users in nearly 20% more of those census tracts. Moreover, as explained on the Service Tier and Price Table and further on the Points of Presence worksheet, Iowa Telecom's network supports much higher-speed "middle mile" and commercial services (of speeds over 1 Gbps) in hundreds of locations across the State. Thus, the data prove that a "critical community infrastructure" is in place today, and the community anchor institutions and others in those communities already have more than sufficient access to broadband. Iowa Telecom currently faces significant competition in parts of its serving area from, among others, a state-owned network entity that focuses on providing services only to community anchor institutions in Iowa. In its past several sessions, the state legislature has refused to provide funding to upgrade or expand this state-owned network. In fact, the state has considered alternatives to get out of the telecommunications business. Providing this competitor with federal government funds to expand its network through a rebuild that overlaps Iowa Telecom's fiber network will not promote the delivery of broadband services to residential and small business customers in rural Iowa. Instead, it will ignore the repeated decisions of the state legislature and only further undercut Iowa Telecom's effort to compete against this state-owned entity to deliver the promise of broadband to all types of customers in Iowa. To ensure that the community anchors and all other consumers in the communities served by Iowa Telecom continue to enjoy the benefits of expanding broadband availability, it is essential that NTIA reject the two applications submitted by Iowa Communications Network that would fund unnecessary expansion of this redundant, government subsidized, network that has and will continue to undermine the customer base that otherwise would enable Iowa Telecom to continue its own substantial network investments.