Public Notice Submission

Provider Name: LINCOLN COUNTY TELEPHONE SYSTEM, INC.

Summary: While a census block or tract within the service territory of Lincoln County Telephone System, Inc. (LCTS) has not been included in the NTIA list, an NTIA applicant has indicated in its summary its intention to hire a manager to provide wholesale "middle mile" service to various locations within the state of Nevada as part of its 'sustainability' model. One of those communities mentioned is within the LCTS service area: Caliente, NV. In particular, the summary states: "Through a partnership with Arizona Nevada Tower Corporation high speed access will reach areas where a fiber build is not practical, such as Caliente, Nevada." LCTS has come to the conclusion that it is "not practical" because LCTS already has a fiber middle mile facility available with existing broadband capability up to 4Gb. LCTS believes BTOP funds can be better leveraged by using them to deploy facilities where they currently do not exist. In the case with Caliente, the applicant appears to be proposing to duplicate the existing LCTS fiber middle mile network with an inferior microwave system. As a small rural carrier, LCTS has financially indebted itself to both upgrade and maintain its network. The LCTS network is comprehensive in that it includes both last and middle mile systems. They are not mutually exclusive when it comes to obtaining a return on the investment. The loss of utilization of the LCTS middle mile through any publicly-subsidized competitive offering has the potential to economically destabilize the organization, jeopardizing the jobs that LCTS currently provides in this rural/remote community. LCTS serves the entire area of Lincoln County NV, in which Caliente is located, along with a very small area within Clark County NV, currently with no permanent residential population. Household data is provided using the Lincoln County census tracts.   However, LCTS provides all broadband services and tiers throughout its entire serving area.