

Rebuttal to Public Comment

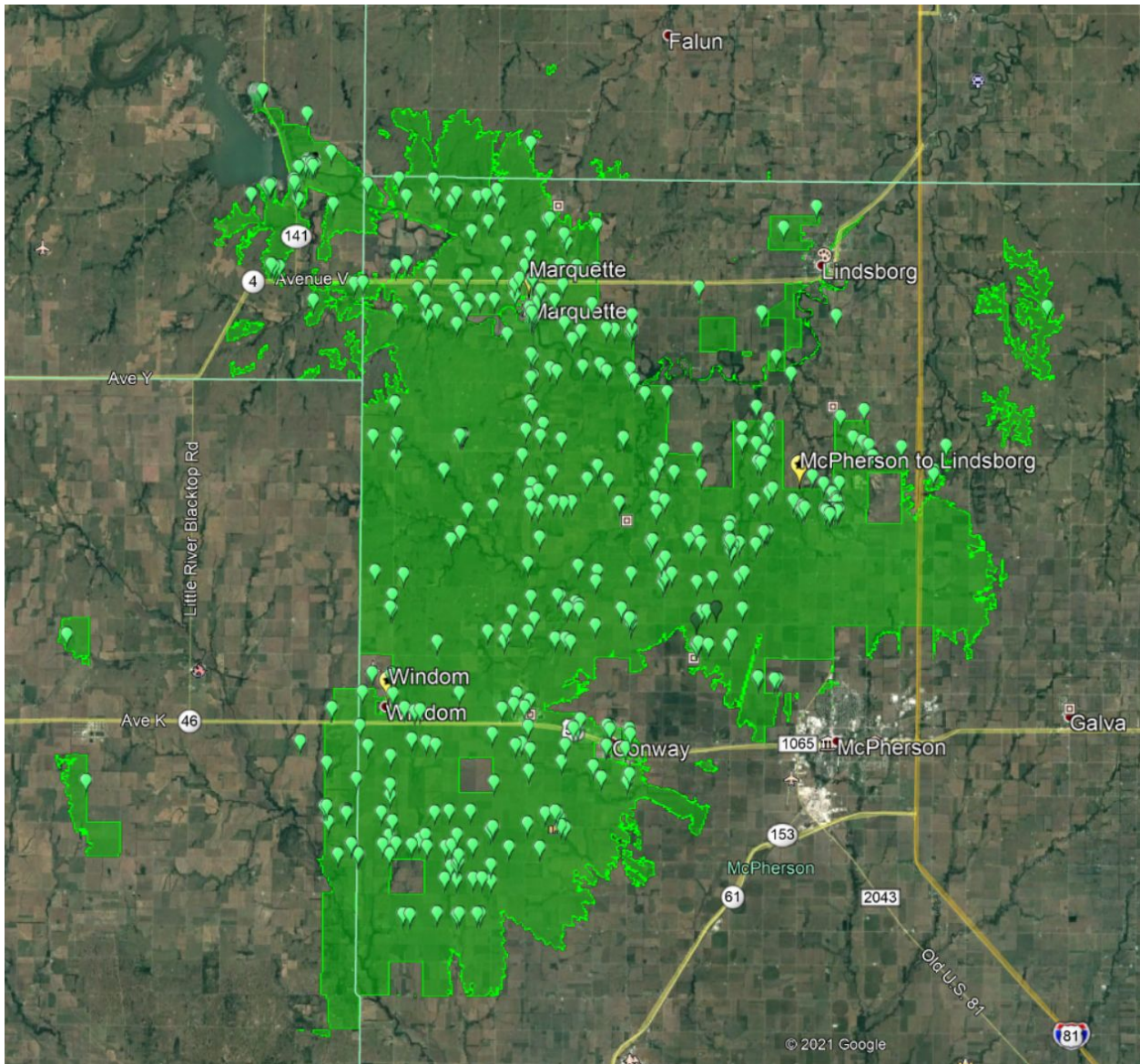
IdeaTek Telcom

Project: IdeaTek-NorthMcPherson

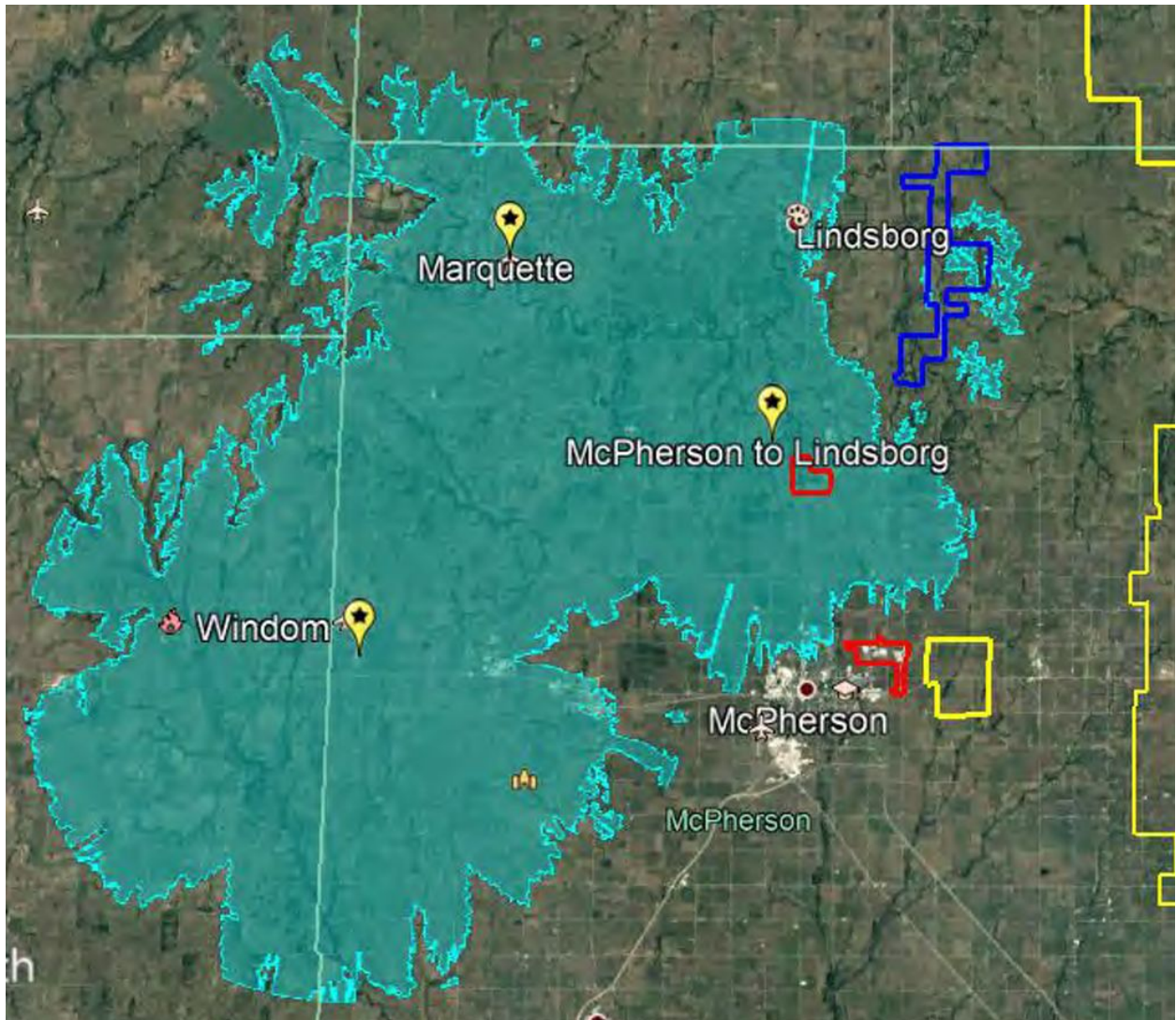
1. Comment: 0031 / Richard Baldwin / Home Communications

We believe we accurately identified and removed Home's customers in our proposal. The primary concern raised here by Home is a result of the natural propagation of wireless signal and the inability to exclude serviced premises in our effort to include those unserved areas.

A view of the unserved premises (green balloons) with our proposed service coverage area shows our intent not to count any served locations.



Regardless, there appears to be very little overlap in Home Communications (Yellow, Blue, and Red Lines) and IdeaTek's application (teal) as show by Home's own map:

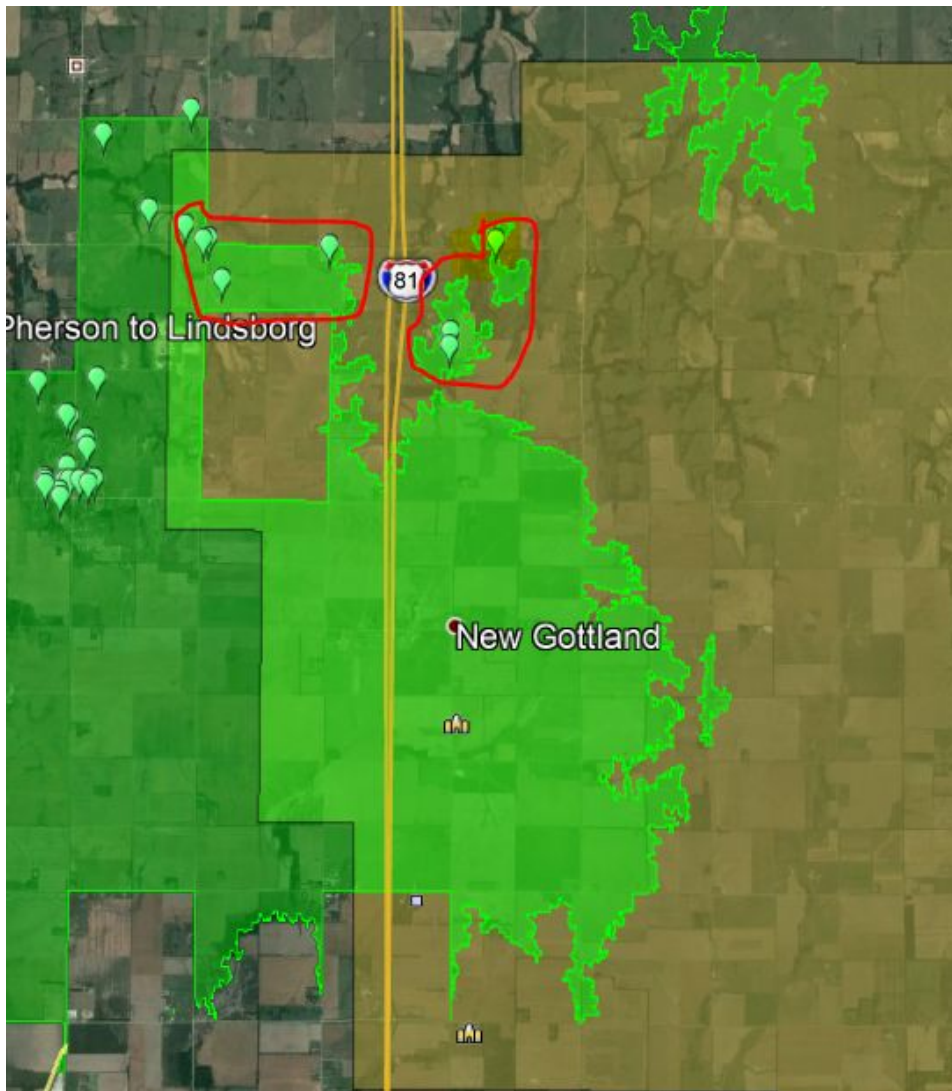


2. Comment: 0031 / Richard Baldwin / Home Telephone Company

Home provided their entire exchange area as fully covered even though their 477 filing indicates otherwise. We are aware that Home appeared to have an error in its most recent 477 filing as its entire service area became unserved in that filing. We intentionally avoided taking advantage of that error and also pointed this matter out in our objection to KwiKom's application for McPherson.

However, the actual number of unserved premises we targeted in Home's territory was only 7 premises because both of Home's most recent filings (not just the anomalous one) showed these premises as unserved. Regardless, the objection here is for a de minimis amount of overlap.

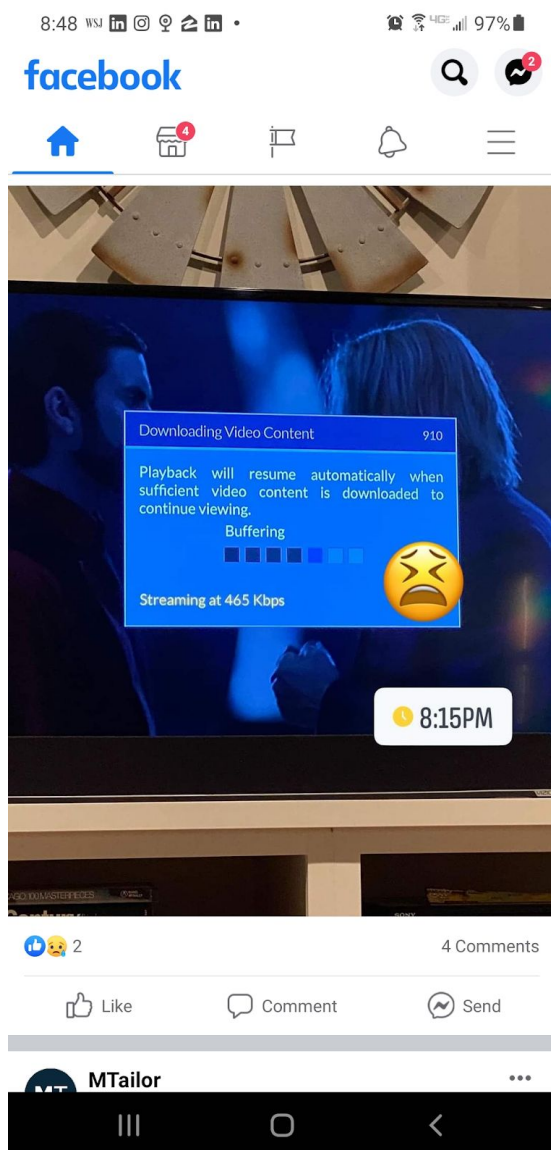
IdeaTek Service Area (Green) / Unserved Premise (green balloon) / Home ILEC exchange (Tan).



3. Comment: 0006 / John Tietjens / LR Communications, Inc.

IdeaTek's application does not include any of LR's fiber footprint except unavoidable wireless overlap. It is very difficult to rebut LR's broad claim that it *will be* providing upgraded wireless service in the other areas of IdeaTek's application with nothing more than a map. Additionally, the coverage areas shown by LR seem to use simple distance ranges rather than the detailed propagation maps required for true wireless coverage and range estimation (note how our service areas are dynamic with jagged edges showing coverage based on actual terrain and other impact variables). We are aware of LR's wireless service and have been told by customers that the service is very slow and not anywhere near the speeds they are claiming.

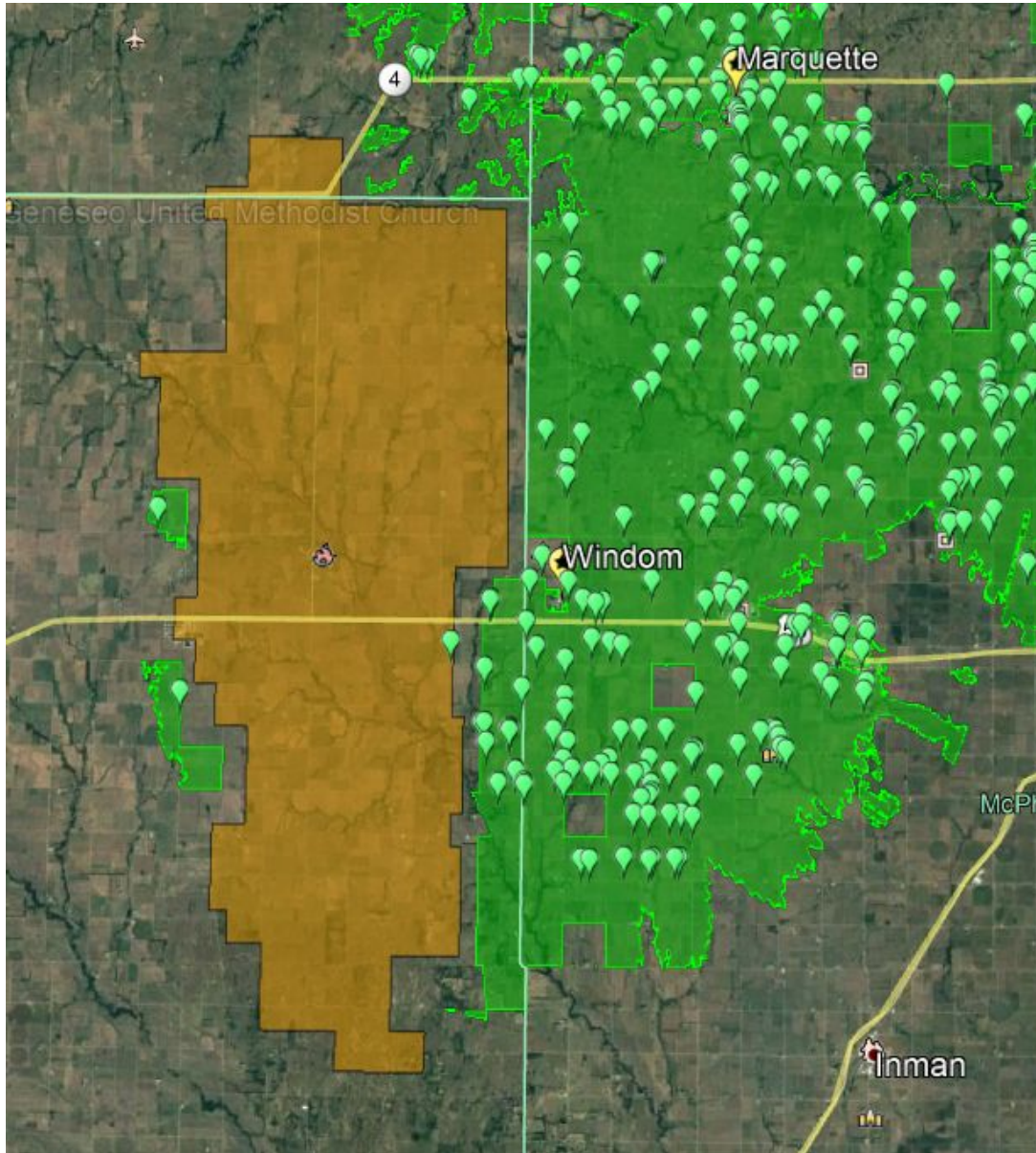
Example 1: confirmed LR customer North of Windom publicly posted this on Facebook 2/5/21



4. Comment: 0014/ John Tietjens / Mutual Telephone Company

IdeaTek's application does not include any of Mutual's footprint

IdeaTek (green) Mutual (Orange)



In addition, when inquiring about their fiber product pricing in the Orange area, a quote of \$150/month for their 25 Mbps service was given if phone is not bundled. This is approximately 85% higher than the FCC's required rate for 25/3 Mbps broadband service¹. These minimum products should be affordable to those underserved as proposed by our application.

¹ FCC WC Docket No. 10-90, Released November 30, 2020, <https://docs.fcc.gov/public/attachments/DA-20-1409A1.pdf>

Summary

Limited specific evidence has been provided to demonstrate service is available to these fringe service areas today and this application is likely spurring the incumbent providers to claim they will accelerate their deployments. No comments sufficiently prove that qualified service is available to *all* residential customers in our proposed service areas which is a critical requirement of the public comment process.