

Rebuttal to Public Comment

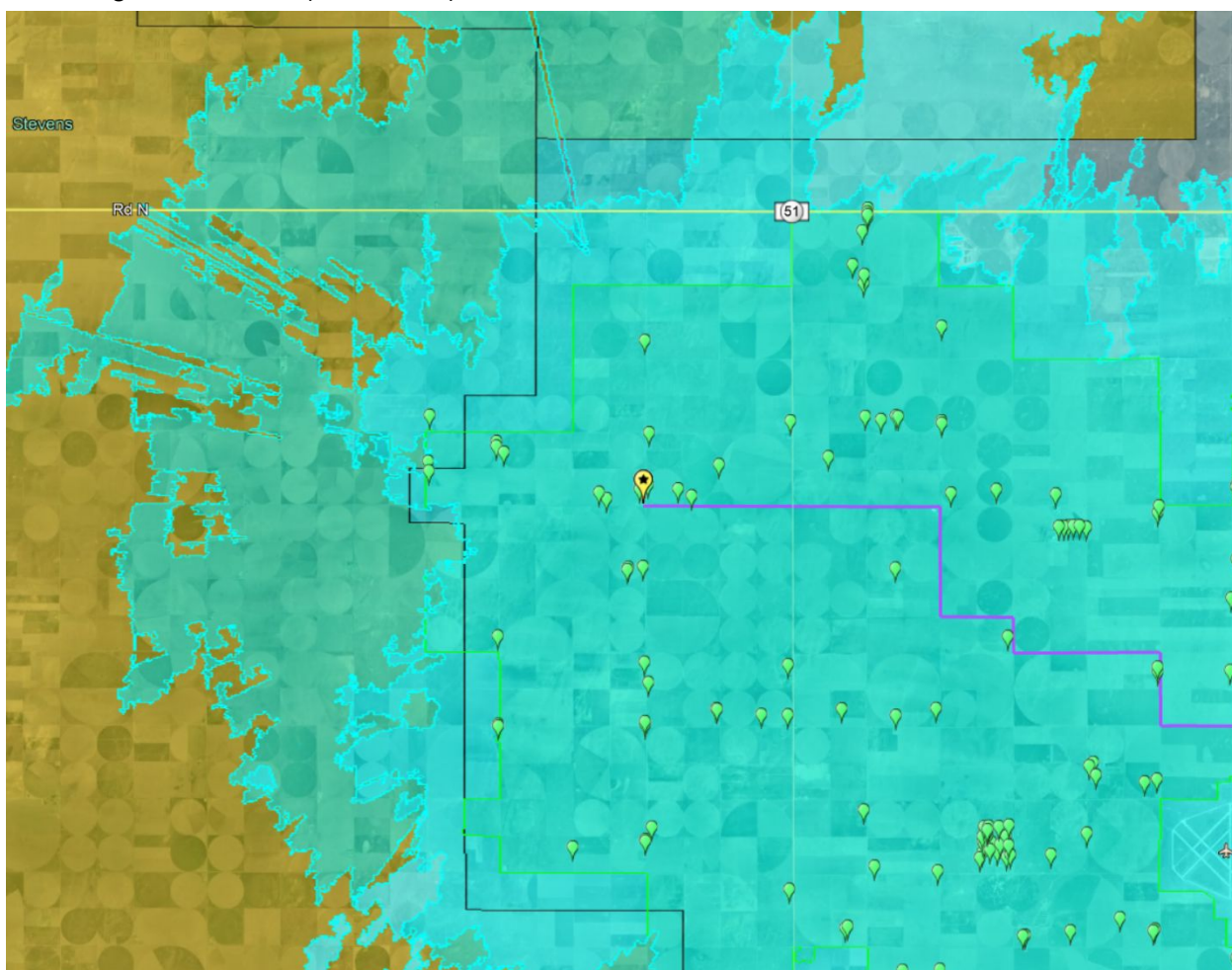
IdeaTek Telcom

Project: IdeaTek-Southwest

1. Comment: 0050 / Catherine Moyer / Pioneer Communications

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

A view of the unserved premises (green balloons) with our proposed service coverage area (teal) shows our intent not to count any served locations in Pioneer's territory (gold / bluegreen) / exchange boundaries (black lines)



2. Comment: 0071 / Todd Houseman / United Telephone

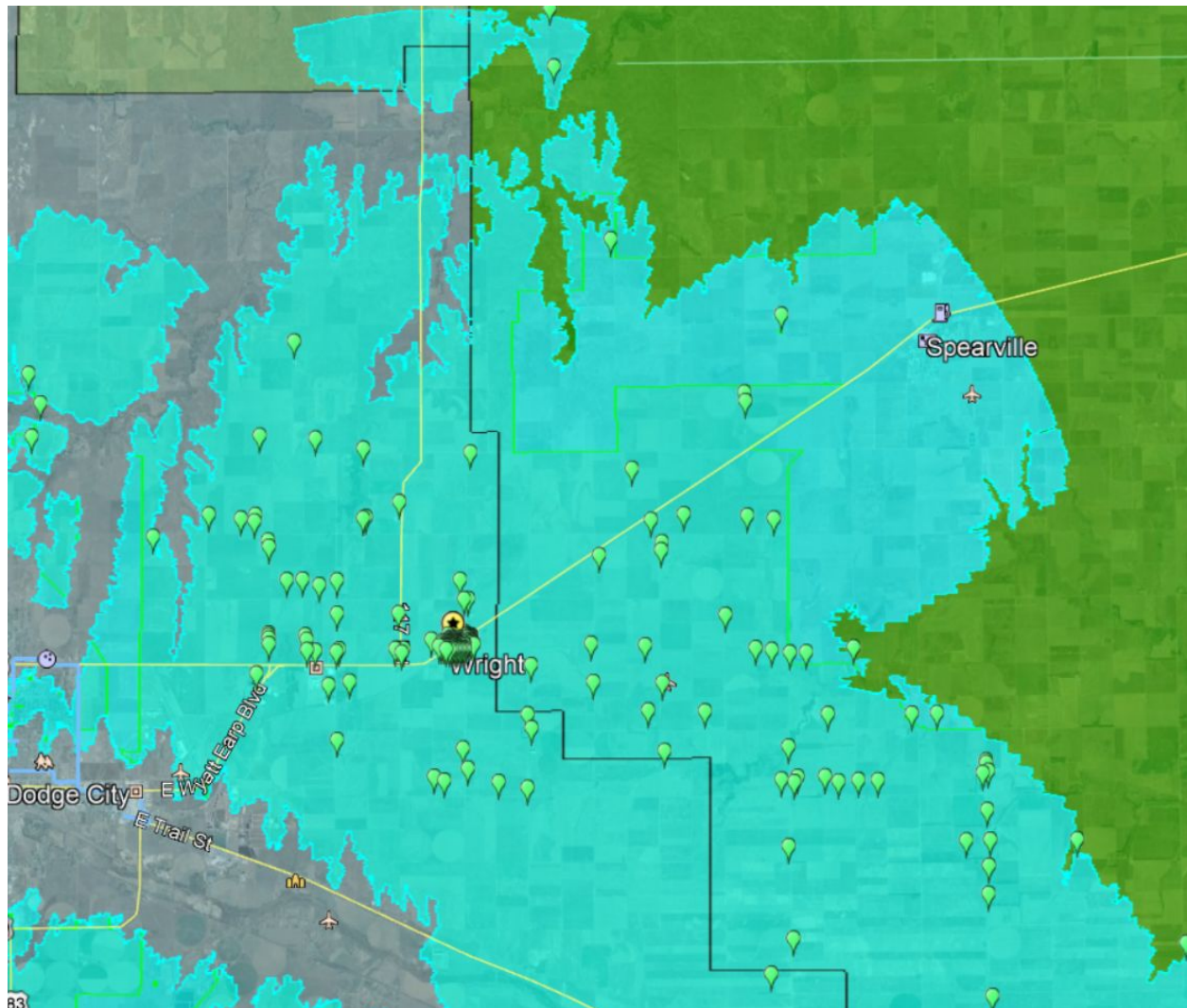
United raises a number of comments related to our proposed cluster of wireless deployments around Dodge City. It is important to note that while United indicates a percentage of completion, they include the town customers in that percentage. The last 20% of customers to be served throughout a service area are typically the last to get service, and in many cases they are not serviced entirely. Therefore, we ask that less weight be put on statistics that do not cover 100% of the service area.

We will address each exchange area individually below:

1. Montezuma / Copeland is serviced by the same proposed Montezuma Tower:
 - a. Montezuma - 21% of this exchange is still unserved by United's admission and any overlap is caused by wireless propagation necessary to reach unserved premises.
 - b. Copeland - 47% of the exchange remains unserved and United indicates that it will be 2022 before those areas are potentially resolved. The BAG program rules indicated that service coverages should be sufficiently proven and available within 12 months. Therefore this area should qualify despite the objection.
2. Spearville - 21% the exchange remains unserved and United indicates that it will be 2022 before those areas are potentially resolved. The BAG program rules indicated that service coverages should be sufficiently proven and available within 12 months. Therefore this area should qualify despite the objection.

Additionally, this tower is centered significantly west of Spearville and the coverage United objects to is related to unintended wireless propagation. The primary target of this area is the small town of Wright in the AT&T territory fringes and other premises in the Dodge City (AT&T) territory.

IdeaTek service area (teal) / Unserved Premise (Green balloon) / AT&T (dark blue) / United (Green)



3. Ford / Kingstown - IdeaTek is willing to remove this deployment from its project given the commitment from United that the entire exchange area will be deployed in 2021.
4. United's other claims of new wireless deployments do not discuss speed or service coverage nor do they commit to being completed in 12 months.

Summary

Limited *specific* evidence has been provided to demonstrate service is available to these fridge 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.