Public Notice Submission

Provider Name: Spirit Telecom

Summary: The request of any applicant to build facilities in Spirit Telecom's service area should not be considered for funding because, as shown in the attached worksheet, Spirit Telecom currently provides sufficient high-speed, transport services throughout South Carolina. Funding Middle Mile applications in South Carolina would overbuild existing transport infrastructure because facilities are already in place. The existing network is currently being utilized to provide services to anchor institutions located within South Carolina, and most, if not all, are already receiving services at speeds of their choosing (between 10 Mbps – Gigabit), with the capability of receiving services at speeds of up to 10 Gigabit if they desire. 100% of Community and Technical Colleges as well as Public Colleges and Universities are connected via fiber today. These institutions currently have connectivity in speeds ranging from 10 Mbps to Gigabit, with the capability of receiving services at speeds of up to 10 Gigabit if they desire. Over 98% of K-12 Schools (1,248 schools) across South Carolina enjoy unprecedented broadband (10 Mbps - Gigabit) connectivity between schools and to the internet, with the capability of receiving services at speeds of up to 10 Gigabit if they desire. In addition to broadband services Spirit Telecom provides high-speed Wide Area Network connectivity between institutions via fiber. The rate of fiber connectivity to hospitals in South Carolina is also very high, with over 98% of hospitals having fiber entrance facilities today.

Funding of Middle Mile applications in South Carolina will not further the goals of ARRA and the Broadband stimulus program and will likely result in net job loss to South Carolina workers. Moreover, if this funding is approved it may have a significant adverse impact on current federal funding programs such as E-Rate which is used to help some of these same institutions fund broadband connectivity today.

As a provider of telecommunication services, Spirit Telecom currently offers extensive point-to-point and point-to-multipoint bandwidth services to locations throughout South Carolina. With over a 2,500 mile fiber-optic network, transport offerings from 1.5 Mbps (T1) to 10 Gigabit (LAN PHY) rates are available between at least 29 POP locations. We also offer co-location services in major cities in South Carolina, including Clemson, Greenville, Anderson, Spartanburg, Columbia, and Florence.

Please refer to the completed Points of Presence worksheet which illustrates where Middle Mile services are available throughout South Carolina.