

Public Notice Submission

Provider Name: GTA Telecom, LLC

Summary: GTA has made extensive broadband deployment efforts in recent years as the data enclosed here shows. Notwithstanding the hard-to-serve nature of some areas, the confidential data herein prove that the households, businesses, and community anchor institutions are already well-served and have a panoply of service offerings available to them. GTA has invested about \$75 million on network infrastructure since privatization in 2005, another \$10 million is planned for 2010, and most other providers on Guam are matching capital investments to stay current and grow. GTA's service offerings are robust in terms of speed and reach. As the data here show, in the specific Guam census tracts for which BTOP funds are sought, every household has access to broadband from GTA at speeds of up to 10 Mbps. Many of these households can select from a choice of providers. Moreover, every school, library, village community center and government building on Guam already has broadband of at least 25 Mbps available to it, and many (including most public schools) have access of up to 100 Mbps. Thus, GTA not only serves the areas in which these community anchors are located; it also offers and provides high-quality, high-speed broadband service to many of the community anchors themselves. GTA already operates in the midst of a highly competitive market--4 wireless carriers overlap coverage on Guam, 3 CLECs compete with GTA, and 2 pay TV companies offer bundles that include broadband. The wireless networks offer 3G and GSM connectivity via Blackberry and iPhone devices. Ultra-fast Ethernet-over-copper access for businesses covers about 80% of the addressable market. Providers are rolling out speeds of 50 to 100Mbps via FTTH and DOCSIS 3.0. Rates for broadband Internet access on Guam are steadily decreasing--even as the costs of serving customers in Guam remain much higher than a typical U.S. broadband deployment because of the expansive "middle mile" submarine cable transport needed to take traffic to and from an Internet peering point over 5,000 miles away. In short, Guam is already moving toward the vision of the FCC's National Broadband Plan--a level playing field where multiple competitors strive to improve service and deliver service at the lowest price to attract and retain customers. Subsidizing a competitor to give away service to community anchors and compete in villages where broadband is already available will harm this competitive market. It will lead to artificial capture of the highest-value customers that are the bedrock institutions in their communities. In turn, competitors will find it hard to justify network investment and support services at affordable rates in more remote areas as these anchor customers are "locked up" by a subsidized competitor. Households, businesses, and community anchors on Guam are not lacking for high-speed broadband access today. Providing a sizeable grant to overbuild Guam will only discourage private investment, deter competitive network upgrades, and upset the balance of an already competitive broadband market.