

## Public Notice Submission

**Provider Name:** Hargray Communications Group

**Summary:** The request of any applicant to build facilities in the service area of Hargray Telephone Co., Bluffton Telephone Co., or Hargray, Inc. collectively (Hargray) should not be considered for funding because, as shown in the attached worksheets, Hargray currently provides sufficient high-speed broadband internet service in the pertinent Census blocks/tracts. Specifically, 99% of households have broadband available. In addition to services being provided by other carriers operating in the area, Hargray, alone, has 42% of broadband subscribership throughout our service area. The highest available speeds are 10 Mbps downstream and 1Mbps upstream, which exceed the minimum threshold set forth in the Notice of Funds Availability ("NoFA") published by NTIA for Round 2 BTOP funding. Moreover, Hargray provides broadband services at competitive market rates, as demonstrated by our significant subscriber penetration rates. Additionally, applications proposing to provide service in our territory do not meet the NoFA's definition of "underserved" or "unserved" area. Moreover, funding of this application would overbuild existing broadband infrastructure. Please refer to the completed Points of Presence worksheet which illustrates where middle mile services are available throughout our service territory. Finally, the most important criterion for NTIA to consider in awarding Comprehensive Community Infrastructure/Middle Mile projects, according to the NoFA, is whether the project "will deploy Middle Mile broadband infrastructure with a commitment to offer new or substantially upgraded service to community anchor institutions." Funding of this application is unnecessary because facilities are already in place to provide services to anchor institutions located within the area, and most, if not all, are already receiving services at speeds of their choosing. Hargray notes that no fewer than four (4) separate fiber optic cables owned by separate entities, at least two of whom offer transport services to other carriers run with ½ mile of USC Beaufort and the Technical College of the Low Country. Embarras, Time Warner Cable, PalmettoNet, and Hargray Telephone have all deployed Fiber down high way 278, which passes both institutions. Hargray's fiber cable actually runs into both institutions as well as USC Beaufort's main campus in Beaufort. All institutions of higher learning, including public and private universities and community and technical colleges, are 100% covered by fiber and may obtain speeds as desired up to 1 Gb. In fact, not only does Hargray have fiber directly into both local colleges, Hargray contributes approximately \$80,000 a year in free services to USC Beaufort as part of its efforts to promote education in the community. Likewise, 100% of K-12 schools and libraries are currently being served with broadband services. Hargray recently negotiated lower rates for schools as well as all government agencies. The specific rate and speed can be found in the confidential portion of this filing. All hospitals located within our service territory are connected with fiber at desired speeds of their choosing up to 100 Mb. Any other health care providers or facilities located within the area also have available sufficient connectivity capable of being deployed at the desired speeds of those providers and facilities. Specifically, Hargray recently received an order for and began provisioning to add a 2nd fiber connection to a local health care provider.