



May 26, 2010

The Honorable Larry Strickling, Assistant Secretary
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue
Washington, D.C. 20230

Dear Assistant Secretary Strickling,

I am writing in opposition to the Broadband Technology Opportunity Program (BTOP) middle mile applications that have been filed in Montana in Round 2. I refer specifically to the applications of XO Communications (application ID 5601) and the Native American Development Corporation (application ID 7638). Both of these proposed projects duplicate existing networks in Montana and would be an obvious waste of federal tax dollars. I spoke with representatives of both applicants, prior to their submissions, and explained the service options available to them. Both were clear in their response that, although they understood capacity to be available, they had no interest in leveraging existing, fully capable, infrastructure.

Vision Net, Inc. is a Montana owned company with offices in Great Falls, Billings and Missoula. Our company and other middle mile carriers (360 Networks, AT&T, Sprint and Qwest), along with Montana's rural telephone companies, have invested significantly to build and support network capacity across Montana. The intent of the Broadband Stimulus Program is to provide support for underserved and unserved areas, but there is no demonstration of that in these two applications. To the contrary, these applications request federal money to overbuild the facilities that are currently available from other companies.

I encourage your support of applications that meet the intent of the program. These two applications clearly do not.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Ferris', written in a cursive style.

Rob Ferris, CEO
Vision Net, Inc.