In the Matter of

Lifeline and Link Up Reform and Modernization WC Docket No. 11-42
Telecommunications Carriers Eligible for Universal Service Support WC Docket No. 09-197
Connect America Fund WC Docket No. 10-90

REPLY COMMENTS OF AXIOM TECHNOLOGIES

I. Axiom Technologies provides details for and joins with other digital inclusion supporters encouraging inclusion of community-based low-cost broadband solutions as Lifeline broadband providers.

Axiom Technologies, an internet service provider in Washington County Maine wishes to support the comments of the National Digital Inclusion Alliance and the supporters of NDIA as found in their Initial Comments and in the comments of:

- Benton Foundation, p. 46
- California Emerging Technology Fund, p. 44
- Connected Nation, p. 15
- National Housing Conference, p. 3
- New American, p. 13
- Schools, Health, Library Broadband Coalition, p. 6

Axiom is an Internet Service Provider with a strong social mission to serve last-mile customers in one of the poorest and most geographically difficult regions in Maine and nationally. We have been in existence since 2005 and have approximately 1000 customers, all of them rural, mostly disadvantaged and extremely difficult to reach.

We believed in our charge to serve the people of Washington County so much that in 2014 we created a non-profit side to the company, Axiom Education and Training Center to support citizens in the region with educational and support services. We are part of four national initiatives and have been recognized nationally as a BTOP recipient that served rural farmers and fishermen and through national private foundations for the work we do to provide digital literacy services to our region.
Axiom would be pleased to offer low-cost Lifeline services to our citizens and would welcome the opportunity to participate in a program that currently is able to be provided only to an Eligible Telecommunication Carrier (ETC). Acquiring this designation creates a huge barrier for small carriers like us. Does it make sense for small ISPs like Axiom to provide this service? There are several advantages to a company like Axiom having the opportunity.

- We truly deliver “last-mile” services to homes and businesses, often at break-even margins
- We work hard every day to remove barriers to adoption and programs like Lifeline
- We know our customers, often on a first name basis, and offer local technical support
- The subsidy would make these investments financially viable
- It would allow us to expand backhaul capacity and expand geographically into the additional 40,000 homes in Maine that remain without any Broadband connection

Last, we would support providing a Lifeline service for $19.99/ month across our service area, at the highest rates available in that service area. In some cases that would be 20/10Mbps, in others it would be a 3/1Mbps. The $10 subsidy would help us make those investments feasible and help us expand on the company’s mission to: “serve every last mile customer in the State of Maine; we will not stop until this is accomplished.”