



Providing Professional Services to
the Telecommunications Industry Since 1994

October 8, 2013

Catherine Wightman
Greater Sage-Grouse Habitat
Conservation Advisory Council

Re: Draft Sage-grouse Advisory Council

Dear Catherine:

After the work meetings earlier this week, it was suggested that I summarize in writing the comments I delivered during the Public Comment segment of the meeting. I am therefore submitting this letter to be included in the official record of the conservation strategy planning process.

Montana Independent Telecommunications Systems (MITS) is an association comprised of seven Montana incumbent telecommunications providers, representing Nemont Communications (Nemont Cooperative and Project Telephone), with headquarters in Scobey; Triangle Communications (Triangle Cooperative and Central Montana Communications), with headquarters in Havre; Northern Telephone Cooperative with headquarters in Sunburst; InterBel Telephone Cooperative with headquarters in Eureka; and Mid-Rivers Communications with headquarters in Circle. Cumulatively, these companies serve an area encompassing approximately two-thirds of Montana's geography, stretching in part from Eureka to Ekalaka, and from the Canadian border on the north nearly to the Wyoming border on the south.

MITS companies deliver voice, data, broadband and video applications and provide services over a variety of technologies including copper, fiber, cable, microwave, cellular, fixed wireless, and satellite. They are Montana-based, Montana-committed businesses that have operated continuously for decades serving rural Montana towns and communities. They and their affiliated companies have invested millions of dollars in high quality networks and infrastructure to provide wireline and wireless communications and broadband, critical to economic development and public safety in rural Montana.

The Greater Sage-grouse Core areas and the Draft Special Management Core Areas lay within the service areas of Montana's rural telecommunications providers.

2021 11th Avenue, Suite 12, Helena, MT 59601
Mobile: 406.594.9662 / Office: 406.443.1940/ Fax: 1.866.797.3138
E-Mail: blorang@mitstel.com / Web Site: www.mitstel.com

MITS appreciates the opportunity to comment. We recognize the serious work and commitment demonstrated by the Council in developing proposed conservation strategy for sage-grouse habitat in Montana. We welcome the various amendments made to the draft document which will help to reduce some of the negative impacts the initial draft conservation strategy, as outlined, would have had on public access to communications, broadband, and global markets. There remain items of concern to the rural telecom industry.

For example, one of the exempt land uses and landowner and activities is enumerated on Page 26, Item K: Operations and maintenance of existing oil, gas and electric facilities. MITS recommends that “communications and broadband facilities” be added to this exemption. While Item M indicates an exemption for “Emergency response”, that is not sufficient. It is essential that communications facilities be in place, operated and maintained *prior to any situation requiring emergency response*. Access to communications is a matter of life and death in rural and remote Montana.

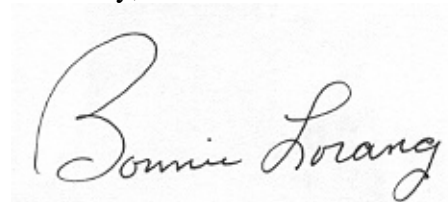
Communications facilities made possible through the efforts of Montana’s rural telecom industry are the foundations for the sustainability of both public and private endeavors in rural Montana. They are a critical component for the operation and advancement of schools, libraries, healthcare providers, hospitals, local, state, and federal government operations including public safety response and E911. The rural telcos have invested millions of dollars in these facilities to provide consumers with access to communications and broadband applications. It is these investments in infrastructure, albeit copper wires, fiber optics, or wireless signals, that steer and sustain rural lives.

Access to mobile communications is increasingly important. In the rural areas of central and eastern Montana, to a large part, consumer access to wireless voice and data is made possible because of the communications infrastructure put in place by rural cooperative telephone companies and their affiliates. Signals from mobile telephones, including those initiated through devices associated with the national wireless companies, are transported via the towers and the transport trunks of the rural telephone companies.

While the preservation and advancement of sage-brush habitat is laudable, it is critical that the Council and the State of Montana, within the decision-making process, carefully consider the impacts that conservation measures will have on broader public interest policies such as public safety, access to affordable broadband, and access to mobile communications.

MITS member companies intend to participate in the November field hearings and offer comments for incorporation into the record compiled for the Greater Sage-grouse Habitat Conservation Strategy for the State of Montana. Thank you for the opportunity to offer comments.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Lorang". The signature is written in black ink on a light-colored background.

Bonnie Lorang, General Manager
Montana Independent Telecom Systems, LLC