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December 28, 2016

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DEC 30 2016

Federal Communications Commission
Office of the Secretary

VIA ECFS and Hand Delivery
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: **First Step Internet, LLC**
FRN 0010766228
Rural Broadband Experiment (SAC 476222)
WC Docket No. 14-259
15-MONTH REPORT AND REQUEST FOR CONFIDENTIAL TREATMENT

DOCKET FILE COPY ORIGINAL

Dear Ms. Dortch:

First Step Internet, LLC ("FSI") hereby submits its certification, pursuant to Paragraph 75 of the Rural Broadband Experiment Order ("RBE R&O"),[1] of compliance with the 15-month build-out milestone for the above-referenced deployment.

Pursuant to Sections 0.457 and 0.459 of the Commission's Rules, 47 C.F.R. §§ 0.457-0.459, FSI hereby requests that the Commission keep confidential and withhold from public inspection the attached exhibits. The attached exhibits are being submitted in both redacted and unredacted versions. Each document that includes confidential information is marked "Confidential, Not For Public Inspection" in the upper right-hand corner. FSI is requesting that the FCC make public only those exhibits that are marked "Redacted." FSI states the following in support of its request for confidential treatment, pursuant to Section 0.459(b) of the Commission's Rules. Each of the numbered paragraphs below addresses the corresponding provision of Section 0.459(b).

(1) *Identification of the specific information for which confidential treatment is requested.* FSI seeks confidential treatment for the attached Exhibit A, which contains a detailed description of the technology and system design for delivery of voice and broadband service.

(2) *Identification of the FCC proceeding in which the information is submitted or a description of the circumstances giving rise to the submission.* This information is being submitted in response to Paragraph 75 of the Rural Broadband Experiment Order.

[1] *Connect America Fund; ETC Annual Reports and Certifications*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 10-90; WC Docket No. 14-58 (rel. July 14, 2014) at para. 75.

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(3) *Explanation of the degree to which the information is commercial or financial or contains a trade secret or is privileged.* The specific information constitutes confidential commercial, proprietary and financial information, which FSI routinely withholds from the public. The public disclosure of this information, which includes information regarding transmission facilities and deployment locations, would place FSI at a severe competitive disadvantage, as it would reveal sensitive information about FSI's operations and performance. This information would be relevant to competitors, not only in the involved census blocks, but in the other geographic areas where FSI competes with other broadband providers.

(4) *Explanation of the degree to which the information concerns a service that is subject to competition.* FSI competes with a variety of large and small broadband providers, both wireline and wireless, across many of FSI's service areas. Public disclosure of the information would allow current and future competitors to use the information for competitive advantage.

(5) *Explanation of how disclosure of the information could result in substantial competitive harm.* See discussion in paragraph (3) above. Due to the competitive marketplace for wireless broadband, the release of such information could substantially harm FSI's ability to compete.

(6) *Identification of any measures taken to prevent unauthorized disclosure.* FSI protects company confidential information. FSI has created both an unredacted and a redacted version of the exhibit, precisely to enable the Commission to have a redacted version of each exhibit to make public, thereby balancing the legitimate information needs of the public with FSI's reasonable confidentiality concerns. To prevent unauthorized disclosure, such information has been marked as confidential, as described above.

(7) *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.* The information which FSI is seeking to preserve as confidential has not been made available to the public or to any third parties other than those who have independent obligations to protect the information, such as counsel and third-party advisers.

(8) *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.* FSI seeks to have this material kept confidential for the duration of the Rural Broadband Experiment program.

(9) *Other information that the party requesting confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.* The Commission recognizes the sensitivity of the commercial and proprietary information contained in the identified Exhibit. Accordingly, the request for confidentiality should be granted.

For the foregoing reasons, FSI respectfully requests that the Bureau grant this Request for Confidential Treatment. Please contact the undersigned if there are any questions regarding this matter.

Respectfully submitted,

/s/
Kevin Owen, President
First Step Internet, LLC

cc (via email, including KML files): Jonathan.Lechter@fcc.gov

First Step Internet, LLC
FCC Registration Number: 0010766228
FCC SAC: 476222
Certification of Compliance with Rural Broadband Experiment
15-Month Build-out Milestones

First Step Internet, LLC ("FSI") submits this certification as required by Paragraph 75 of the Rural Broadband Experiment Order ("RBE R&O").[2] Paragraph 75 of the RBE R&O states that all recipients of RBE funding that elected the accelerated disbursement option must file evidence within 15 months of their first disbursement that they have deployed to at least 25% of the number of required locations. All of the information provided herein is current as of December 1, 2016.

Background

In the Rural Broadband Experiments, the FCC made "$15 million available for projects where the provider would offer at least one service plan that provides 10 Mbps downstream/1 Mbps upstream to all locations within the selected census blocks. This service plan also must offer at least a 100 GB usage allowance, no more than 100 ms of latency, and meet the reasonable comparability benchmarks for the pricing of voice and broadband."[2] In addition, the FCC afforded recipients "the option of accelerating disbursement of support for winning bidders in the experiments for those entities that commit to deploying to at least 25 percent of the requisite number of locations within the first 15 months." FSI was awarded $415,855.63 in Category Two Rural Broadband Experiment ("RBE") funding. FSI's RBE award was first announced on September 11, 2015 and the first disbursement was issued on September 29, 2015. FSI elected the accelerated funding distribution and on September 30, 2015 received the bulk payment amount of $127,182.32.

Description of the Status of FSI's Project

Construction and Deployment to Covered Census Blocks

Service was deployed via Telrad LTE microwave broadband wireless equipment, which was mounted on existing FSI towers. Where necessary, additional battery backup equipment was installed to provide for longer run times in the event of a power failure. Some additional backhaul capacity and redundancy were added in locations to increase service availability and overall network capacity.

[2] *Connect America Fund*, 29 FCC Rcd 8769 (2014).

Based on FSI's predicted RF propagation,[3] FSI has made connections available to end user premises to approximately 95% of the 116 census blocks for this project. Exhibit A provides a map of the RF propagation and describes in detail the covered census blocks.

Evidence of Meeting Public Service Obligations

1) Minimum Speeds: Category Two recipients must offer at least one service plan that provides 10 Mbps downstream/1 Mbps upstream to all locations within the selected census blocks. **Exhibit B** includes screenshots from FSI's website demonstrating that FSI offers and advertises at least one plan that meets this criterion.

2) Minimum Usage Allowance: Category Two recipients must offer within the service plan a monthly usage allowance of at least 100 GB. Attached at **Exhibit C** are screenshots from FSI's website demonstrating that FSI advertises a 10/1 plan with unlimited data.

3) Latency: The RBE R&O requires RBE participants to certify that 95 percent or more of all peak period measurements of network round trip latency are at or below 100 ms. Based on its internal testing, FSI certifies that its network latency satisfies this requirement.

4) Reasonable Comparability Benchmark: Under the RBE program, FSI is required to offer broadband service at rates that are at or below the relevant reasonable comparability benchmark. The current benchmark for basic residential voice services is no more than $41.07, while the current benchmark for broadband services with speeds of 10 Mbps downstream and 1 Mbps upstream and an unlimited usage allowance is $75.20.[3] **Exhibit D** contains screenshots from FSI's website demonstrating that FSI's pricing for voice and broadband services satisfies the reasonable comparability benchmark.

[3] Exhibit A contains RF propagation maps and a description of the methodology used to determine coverage.

EXHIBIT A

[REDACTED]

EXHIBIT B – MINIMUM SPEEDS

Category Two Rural Broadband Experiment recipients must offer at least one service plan that provides 10 Mbps downstream/1 Mbps upstream to all locations within the selected census blocks. This exhibit includes screenshots from FSI's website demonstrating that FSI offers and advertises at least one plan that meets this criterion.

Exhibit B

fsr.com/lte/

Apps » Other bookmarks

FS LTE

ABOUT FSLTE AT A GLANCE HOW TO GET IT SIGN-UP

HOW TO GET LTE

Simply fill out the form below and FSI will contact you about getting LTE service. A sales representative will contact you, explain the terms, and sign you up for service.

PRICING

$0 Equipment and Installation*

$75/month for 10mbps/1mbps Speed Package*

*FSI retains ownership of all LTE installed equipment.

*No Data Caps or Limits - Unlimited Use

*If FSI offeres a lower speed package, customer must keep their initial speed package for a minimum 6 months.

SIGN UP FOR LTE

First Name

EXHIBIT C – MINIMUM USAGE ALLOWANCE

Category Two recipients must offer within the service plan a monthly usage allowance of at least 100 GB. Attached are screenshots from FSI's website demonstrating that FSI advertises a 10/1 plan with unlimited data.

Exhibit C

fsr.com/lte/

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FS LTE

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SIGN UP FOR LTE

First Name

EXHIBIT D – REASONABLE COMPARABILITY BENCHMARK

The attached screenshots from FSI's website demonstrate that FSI's pricing for voice and broadband services satisfies the reasonable comparability benchmark.

Exhibit D

fsr.com/lte/

Apps

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FS LTE

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$75/month for 10mbps/1mbps Speed Package*

*FSI retains ownership of all LTE Installed equipment.

*No Data Caps or Limits - Unlimited Use

*If FSI offeres a lower speed package, customer must keep their initial speed package for a minimum 6 months.

SIGN UP FOR LTE

First Name

Exhibit D

www.fsr.com/fsvoice/

Apps

FSVOICE – VOIP PHONE SERVICE

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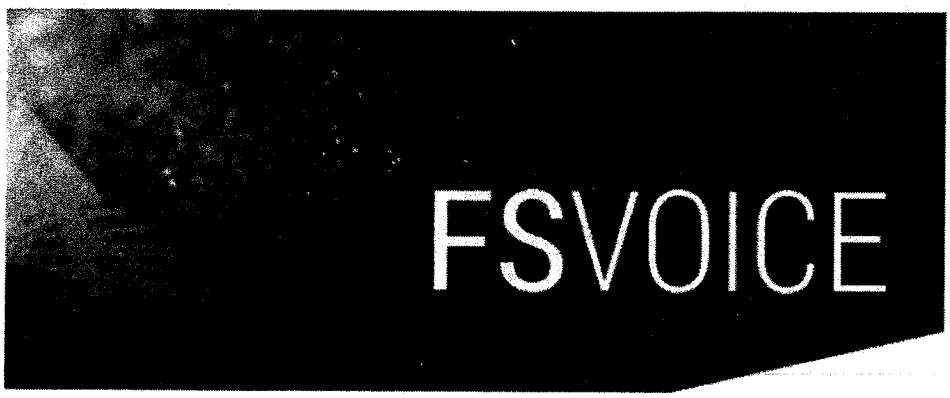

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Cost $25/month with $10 Setup Fee.
The VoIP Modem costs $50+tax (if you do not have one)

Call anywhere in the Continental U.S. for free.
Get Voicemail
Email Voicemail Notification
Universal Voicemail Number
Add additional numbers
Call Forwarding
Emergency Call Forwarding
Caller ID
Block Caller ID
Block Anonymous Calls

Business SIP Trunk services available.
Existing Phone system Integration.

VOIP Requires at least a 4mbps/2mbps internet connection, router, and VoIP Modem. You may use standard analog phone to plug into the VoIP Modem.

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P.O. Box 9587
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Certification

I certify under penalty of perjury that the statements set forth in "Certification of Compliance With Rural Broadband Experiment 15-Month Milestones" are true, to the best of my knowledge, information and belief.

Dated this 28th day of December, 2016.

Kevin W. Owen

President

First Step Internet, LLC