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October 17, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW, Room TW-B204  
Washington DC 20554

**RE: Reply to Comments by Buckeye Hills Regional Council regarding the Rural Digital Opportunity Fund WC Docket Nos. 19-126 and 10-90**

Madam Secretary-

Board of Trustees:  
*Eric Maxson, President*  
*Keith Hood, V. President*  
*Clark Sheets, Secretary*  
*Rob Beiter, Treasurer*  
*Sandra Ogle*  
*Ken Wilson*  
*Greg Fraunfelter*  
*Anna (Tina) Lindsay*  
*Jake Hill*  
*Fred James*

In reply to comments submitted by the Buckeye Hills Regional Council on September 19, 2019, I would like to offer the following additional thoughts with regard to the population and terrain prevalent throughout the Appalachian region and their effects on business decisions. Of course my experience is limited to the State of Ohio, but I am certain my thoughts regarding private business models and the reasoning behind their practices are applicable throughout the region.

Service providers typically will not build out fiber optic infrastructure until it is needed by a customer willing to pay for the construction to extend the service to their location or when the population numbers will support the necessary adoption rate to justify the cost of the investment. Occasionally, a provider will over-build the fiber network into an area by including dark fibers, but most often private broadband service providers will only build what is necessary to fulfill the current need.

The Appalachian Region of Ohio is home to hills, valleys, creeks, trees, and rocks; none of which are conducive to fiber infrastructure build out and even less so to wireless solutions based on line-of-sight technologies. Couple that with small population numbers widely dispersed across the area and the risk and cost are simply too much for a private provider.

Therefore, I am encouraging the FCC to continue to support and subsidize broadband implementation throughout the region. I would also suggest going above and beyond established baselines for high speed internet service. The reasoning behind this is if we are satisfied with the current baseline, which is far below the current capabilities of fiber optic equipment, we will soon be in essentially the same position as we currently are; underserved and unserved with no simple solution in sight.

Thank you for this opportunity to respond and provide additional comments for your consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Joy Davis', is written over a blue circular stamp.

Joy Davis, CECD EcDMP  
Executive Director

Executive Director:  
*Joy Davis, CECD EcDMP*  
Administrative Assistant:  
*Peggi Warthman*