

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Rural Digital Opportunity Fund	)	WC Docket No. 19-126
	)	
Connect America Fund	)	WC Docket No. 10-90

**REPLY COMMENTS OF OPTIMERA, INC.**

OptimERA, Inc. (“OptimERA”) is an Internet Service Provider (“ISP”) based in Unalaska, Alaska, which is the largest town in the Aleutian Island chain. OptimERA provides service to most of the local businesses in Unalaska as well as the majority of household subscribers. OptimERA also provides Wi-fi hotspots throughout the local area to help its subscribers stay connected outside of their homes.

As an ISP dedicated to expanding broadband access in one of the most remote and sparsely populated regions in the U.S., OptimERA has a meaningful interest in the development of the Rural Digital Opportunity Fund (“RDOF”). OptimERA applauds the Commission’s efforts but asks the Commission to reconsider some of its requirements and thresholds for RDOF applicants.

**I. THE COMMISSION’S THRESHOLDS FOR BROADBAND SERVICES  
COULD IMPEDE BROADBAND SERVICE DELIVERY TO RURAL AREAS**

OptimERA appreciates the Commission’s efforts to facilitate the deployment of broadband access in rural areas in order to close the digital divide. As the Commission notes, broadband access is critical for job creation and educational opportunities. However, OptimERA is concerned that some of the Commission’s proposals may limit and unnecessarily delay the roll out of broadband access in the very areas the Commission seeks to help.

OptimERA supports the adoption of technology-neutral standards,<sup>1</sup> but the Commission's current weighting system heavily favors certain technologies and geographies and could impede competitive bids or deployment for some parts of the U.S., including Alaska. The Commission's proposed metrics use arbitrary thresholds that have little to do with the quality of service and the urgent need to facilitate connectivity in a timely manner.<sup>2</sup> With the current latency requirements, the Commission appears to place more emphasis on playing real-time video games, which require 150ms, than it does on delivering educational, medical, and general access to the internet which do not have latency requirements. The Commission fails to properly explain why unconnected end users need enough bandwidth to stream five HD movies at one time.<sup>3</sup> Similarly, the Commission does not, to avoid a significant disadvantage in the bidding process, explain and justify the proposed 100 millisecond latency requirement. Additionally, the Commission also fails to indicate why service providers are required to meet the latency threshold 95% of the time but are not subject to a similar requirement for meeting the speed threshold.<sup>4</sup> These arbitrary standards seem preselected to disfavor certain broadband systems and therefore hamstring the options available to rural ISPs hoping to bring life-changing broadband services to underserved and unserved Americans.

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<sup>1</sup> *Rural Digital Opportunity Fund, Connect America Fund*, Notice of Proposed Rulemaking, WC Docket Nos. 19-126 & 10-90, FCC 19-77 (rel. Aug. 2, 2019) ("NPRM") at ¶ 23.

<sup>2</sup> See Comments of SES Americom, Inc. and O3b Limited, WC Docket Nos. 19-126 & 10-90, filed Sept. 20, 2019 ("SES Comments") at 7; Comments of Viasat, Inc., WC Docket Nos. 19-126 & 10-90, filed Sept. 20, 2019 ("Viasat Comments") at 13.

<sup>3</sup> The recommended internet download speed for HD quality content is 5.0 Megabits per second. See *Internet Connection Speed Recommendations*, Netflix <https://help.netflix.com/en/node/306>.

<sup>4</sup> NPRM at ¶ 12.

OptimERA encourages the Commission to take a pragmatic approach to ensuring that unserved and underserved populations are connected as quickly as possible. The Commission's five-year buildout plan may be a reasonable timeframe for the deployment of a fiber network, but in that time, a young disconnected student today could start and nearly complete elementary school with no connectivity. It is often the case that some communities are so geographically remote, that a fiber network is impossible or impractical to construct, or too expensive to deploy. The cost of deploying terrestrial networks to currently underserved communities across the U.S. far exceeds the funds allocated for the RDOF.<sup>5</sup> The Commission's thresholds should reflect these technical and economic realities and should assist local ISPs to quickly deploy broadband service in rural areas, even if its speed and latency values do not meet the Commission's ideal thresholds. A holistic approach to providing service using the metrics (speed, latency, cost and data allotment) should be taken into account to develop a customer experience rating, giving the commission a better overall view of the services being delivered, giving a fair and equitable bidding process for participating providers.

## **II. SATELLITE CAN SOLVE BROADBAND CONNECTIVITY ISSUES IN THE NEAR TERM**

The Commission recognizes the urgency of closing the digital divide in the U.S., yet the Commission's performance tiers particularly disadvantage satellite services, the one broadband solution that can be delivered in weeks or months, rather than years.

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<sup>5</sup> See *New Study Finds All-Fiber Deployments to 90% of Households Achievable in Next Decade*, The Fiber Broadband Association (Sept. 10, 2019) <https://www.fiberbroadband.org/blog/new-study-finds-all-fiber-deployments-to-90-of-households-achievable-in-next-decade>.

Satellite services can be deployed much quicker than alternative terrestrial solutions.<sup>6</sup> Satellite operators already have ubiquitous coverage in place over the U.S., and earth stations can be easily installed and integrated into ISP networks. Additionally, satellite broadband is a particularly cost-effective option. In some parts of the country, satellite broadband services are competitively priced with, or cheaper than, terrestrial-based broadband services.<sup>7</sup>

With both geostationary and non-geostationary broadband satellites providing service in the U.S., satellite operators can supply connectivity that would meet the needs of nearly any unconnected user. Satellite operators are adding more broadband capacity over the U.S. every year and are uniquely positioned to bring new rural customers online expeditiously.

Satellite systems can contribute in multiple ways to the Commission's goal to connect the unconnected in rural America. Satellite networks do not need to be a permanent solution in every instance, but could serve as a bridge while terrestrial facilities are being built out and then provide redundancy after the terrestrial system is fully deployed.<sup>8</sup> In some instances, satellite connectivity has helped develop private business cases for expanding the terrestrial network.

### **III. CONCLUSION**

The Commission should revisit its proposed thresholds for the RDOF to ensure that rural and remote ISPs can deploy broadband connectivity as quickly as possible. OptimERA urges the Commission to adopt technology-neutral standards without arbitrary requirements to ensure that

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<sup>6</sup> See, e.g., Comments of Pacific Dataport, Inc., WC Docket Nos. 19-126 & 10-90, filed Sept. 20, 2019 ("Pacific Dataport Comments") at 7.

<sup>7</sup> See SES Comments at 2; Viasat Comments at 2; Pacific Dataport Comments at 7; Comments of Hughes Network Systems, LLC, WC Docket Nos. 19-126 & 10-90, filed Sept. 20, 2019, at 4.

<sup>8</sup> Many terrestrial networks in remote areas are particularly vulnerable to disruption because they often have a single path to the internet. Redundant connectivity is critical to ensure that rural communities remain online once they gain access to new broadband services.

RDOF applicants have the option to quickly develop cost-effective and high-performance networks for Americans that lack reliable broadband connectivity.

Respectfully submitted,

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