

March 21, 2018

**Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re:** Notice of Ex Parte Communications; *Accelerating Wireline Broadband Infrastructure Development by Removing Barriers to Infrastructure Investment*, WC Docket 17-84; *Promoting Investment in the 3550-3700 MHz Band*, WT Docket 17-258

Dear Ms. Dortch:

On Monday, March 19, 2018, Ray Ostroski, General Counsel and Vice President Legal; Jim Woodward, Sr. Vice President Finance and Chief Financial Officer; Chris Kyle, Vice President Industry Affairs and Regulatory, all of Shenandoah Telecommunications, Inc. (“Shentel” or “the Company”); and K.C. Halm and Cristina Chou of Davis Wright Tremaine LLP, met separately with: Chairman Pai and Jay Schwarz; Commissioner O’Rielly and Amy Bender; Commissioner Carr and Jamie Susskind; and Commissioner Rosenworcel and Travis Litman to discuss issues raised in the above-referenced proceedings. The representatives listed, with the exception of Ms. Chou, also met with Claude Aiken and Louis Paraetz of Commissioner Clyburn’s staff.

Shentel’s representatives described the Company’s service offerings, investment in network infrastructure and efforts to deliver high-capacity broadband services (both fixed and mobile) to communities in rural, unserved and underserved areas in Virginia, West Virginia, Kentucky, Maryland, North Carolina, Ohio, Pennsylvania and Tennessee. They urged the Commission to continue working towards a rational framework that permits expeditious deployment of the broadband network facilities necessary to ensure that residents in rural communities are not left behind. In addition, the Company’s representatives discussed how the Commission’s adoption of properly sized license areas in the 3.5 GHz proceeding would lead to increased investment in the band and a diverse array of competitive entrants. The presentation used at the meetings is attached.

Pursuant to the Commission’s rules, a copy of this letter is being filed in the above-referenced dockets. Please contact the undersigned if you have any questions regarding this submission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K.C. Halm', with a stylized, cursive script.

K.C. Halm

cc:

Jay Schwarz  
Amy Bender  
Jamie Susskind  
Travis Litman  
Claude Aiken  
Louis Paraetz

Attach.



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***Shentel will ensure that rural communities have access to the same level of telecommunication services as those found anywhere else in the US.***

***Shentel Mission Statement***



# Overview

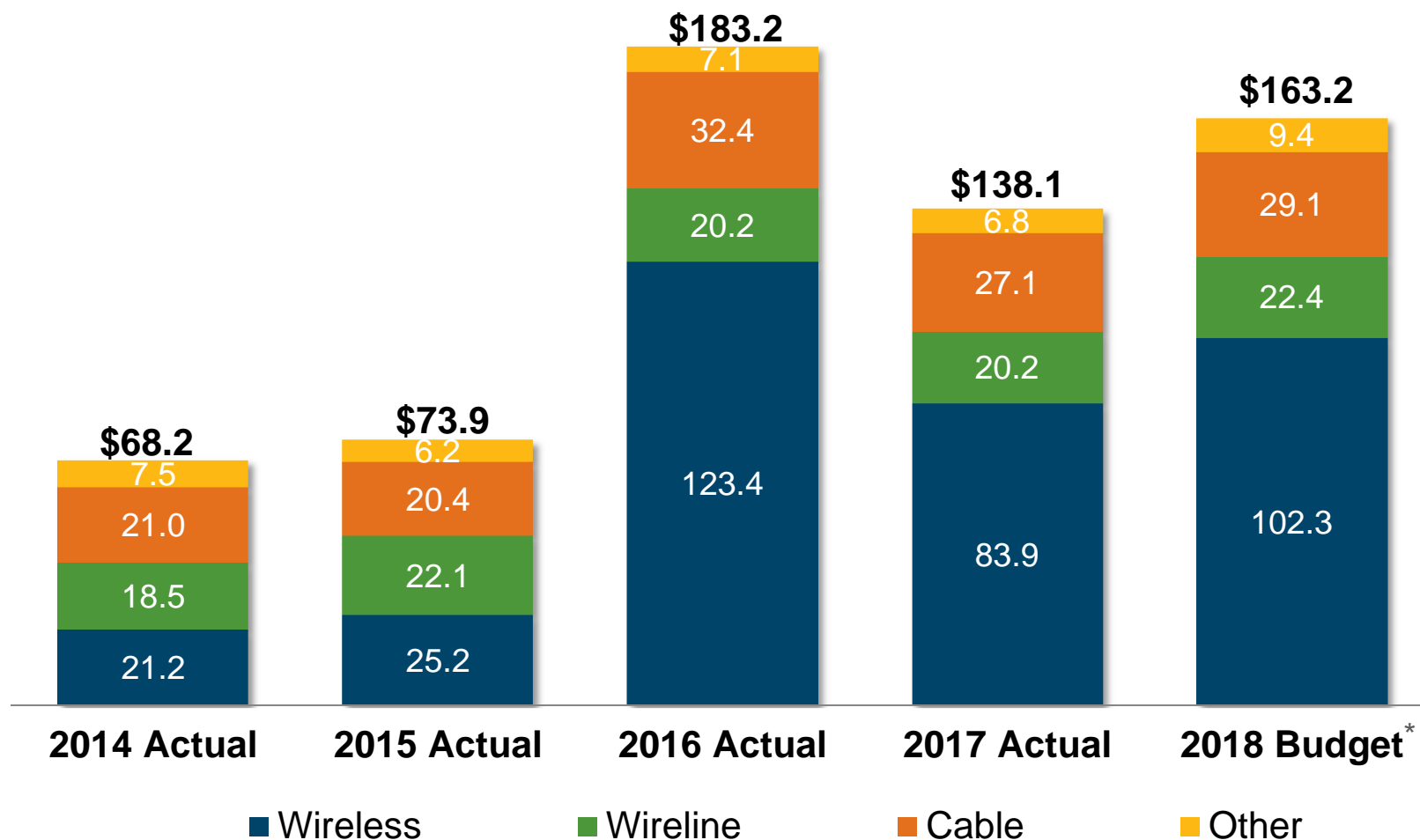
- 116 year old company (NASDAQ: SHEN) focused on delivering Broadband, CATV, phone, and wireless service (Sprint branded) to rural markets in Virginia, West Virginia, Maryland, Pennsylvania, North Carolina, Kentucky, Tennessee, and Ohio
  - Advanced/upgraded network
  - Focused customer support
  - Local community investment
-  *nTelos wireless* acquisition in 2016 (spent over \$200 million upgrading to 4G in the past two years)
  - Sprint provides branding, handsets, spectrum, and back office
  - Shentel responsible for deployment and operations of wireless network, retail stores, and other infrastructure required to provide wireless service to those areas
- 1,050 employees in VA, WV, MD & PA
  - 55 open positions, and 50 new positions budgeted for 2018

# Shentel Highlights


- Over \$600 million in annual revenues in 2017 and profitable (consolidated results based Wireless, Wireline and Cable segments)
- 5,380 miles of fiber
  - “Middle mile” capacity → critical to ensure end-user INET speeds
  - 2018 Residential Internet Speed Roll (15Mbps increased to 25Mbps, 25Mbps to 50Mbps, and 101Mbps to 150Mbps)
- Significant investments in rural communities
  - \$50M wireless coverage expansion in 2018 covering 1M POPs
  - Rural Retreat, VA – 1,400 homes, \$1.2M capex
  - Buchanan, VA – 850 homes, \$650K capex
  - McDowell County, WV – 9,000 homes, \$9M capex
- E-Rate Leadership
  - Over 25 contracts with school systems, libraries, and rural healthcare providers

# Investing in the Future

## Capex Spending (\$ millions)



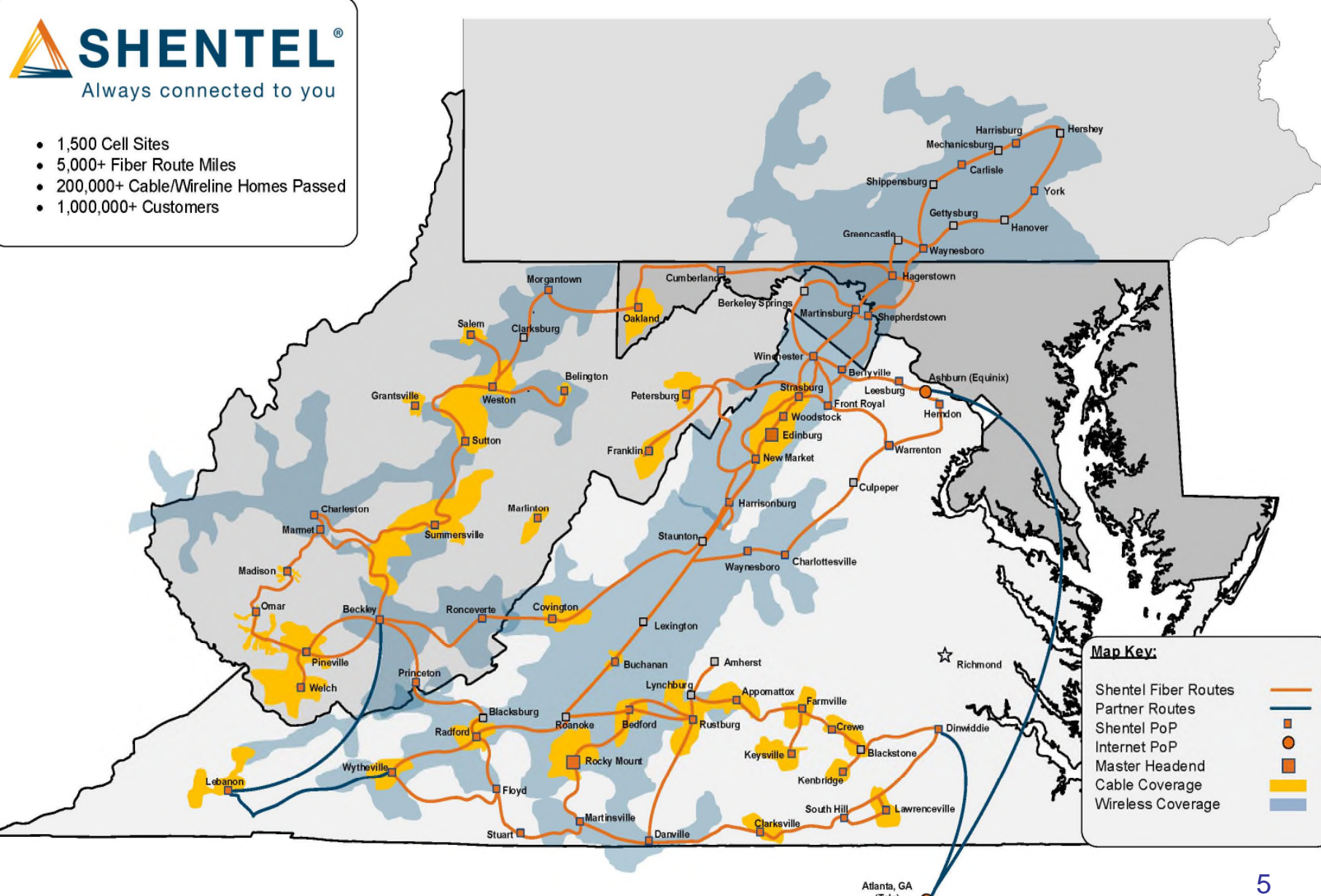




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- 1,500 Cell Sites
- 5,000+ Fiber Route Miles
- 200,000+ Cable/Wireline Homes Passed
- 1,000,000+ Customers



**Map Key:**

- Shentel Fiber Routes
- Partner Routes
- Shentel PoP
- Internet PoP
- Master Headend
- Cable Coverage
- Wireless Coverage

# Shentel's Segments

- Wireless

- Provides digital wireless service to portions of a four-state area covering the region from Harrisburg, York, and Altoona, Pennsylvania to Harrisonburg, Virginia as a Sprint PCS Affiliate.
- Revenue of \$431 million
  - 5.2 million covered POPs / 1,600 sites / 192 towers (owned)
  - Subscribers: 736K postpaid, 226K prepaid

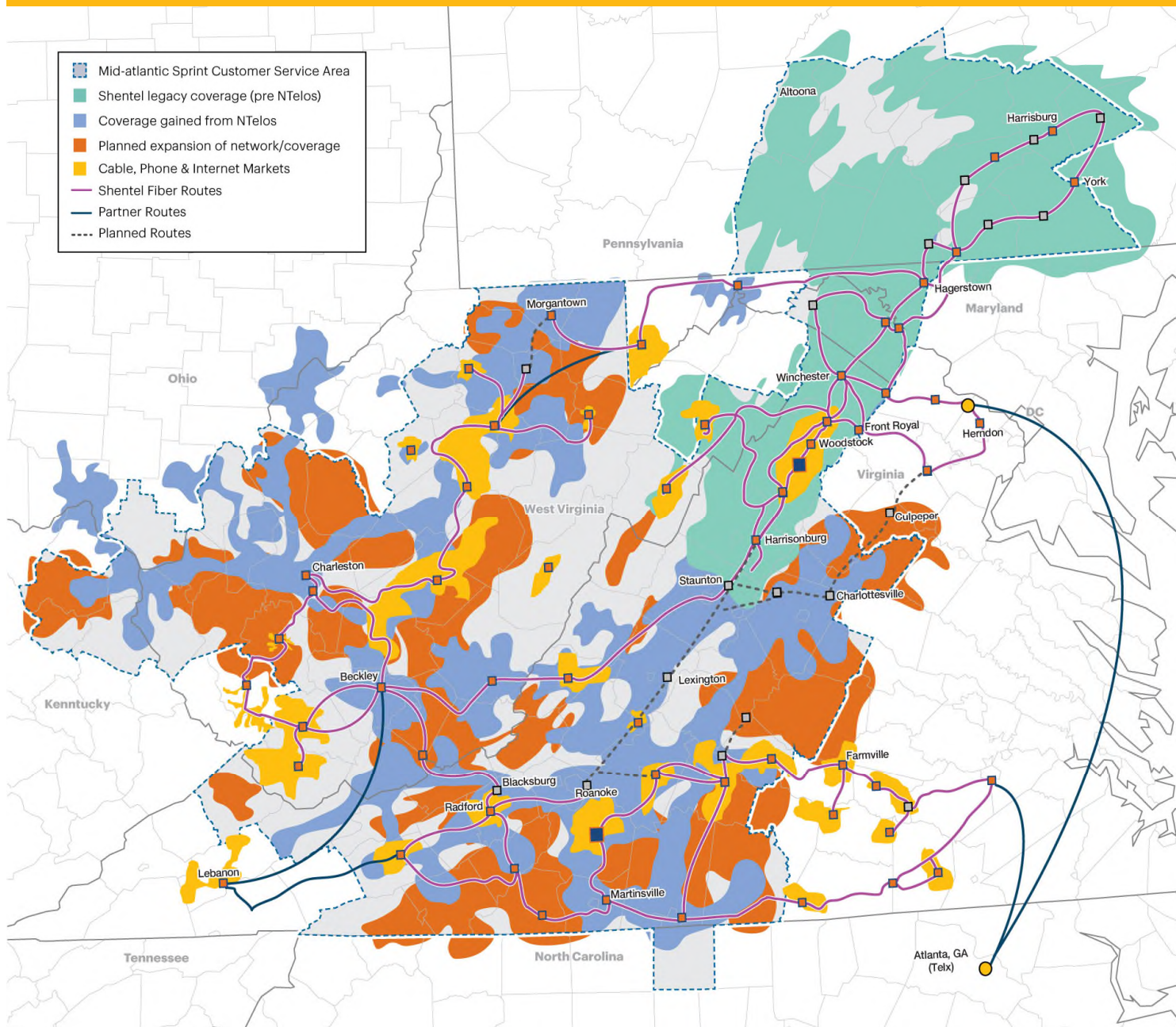
- Cable

- Provides video, Internet, and voice services in franchise areas in Virginia, West Virginia, and western Maryland, and leases fiber optic facilities throughout its service area.
- Revenue of \$119 million
  - 133,000 RGUs / 35% broadband penetration
  - 185,000 homes passed



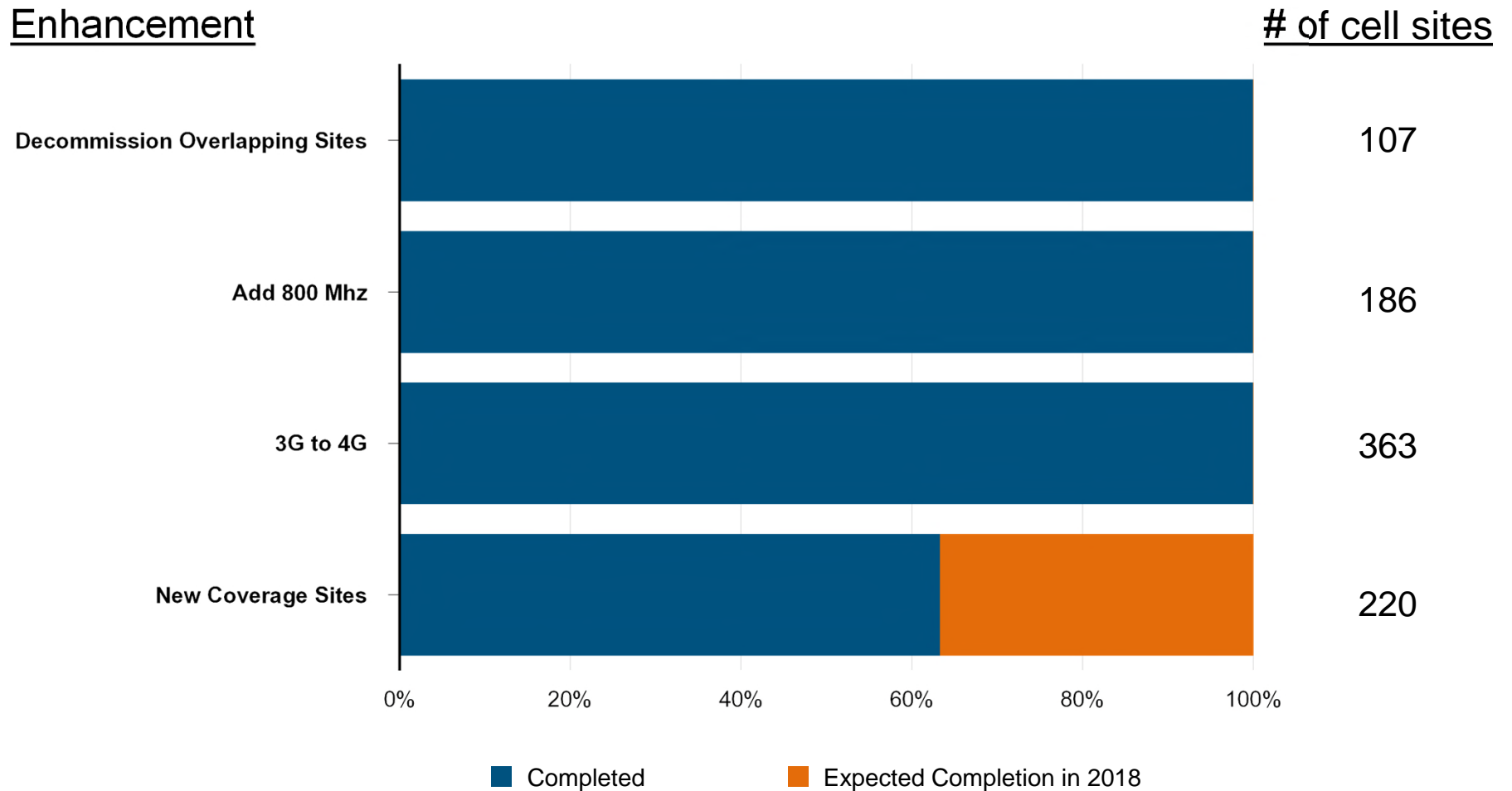
# Shentel's Segments (Continued)

- Wireline
  - Provides regulated and unregulated voice services, DSL Internet access, and long-distance access in Shenandoah County and portions of Rockingham, Frederick, Warren, and Augusta Counties, Virginia.
  - Revenue of \$79 million
    - 17,900 access lines
    - 11,500 DSL customers
    - Ethernet Access for Enterprise customers and Fiber to the tower
    - 5,380 route miles of fiber



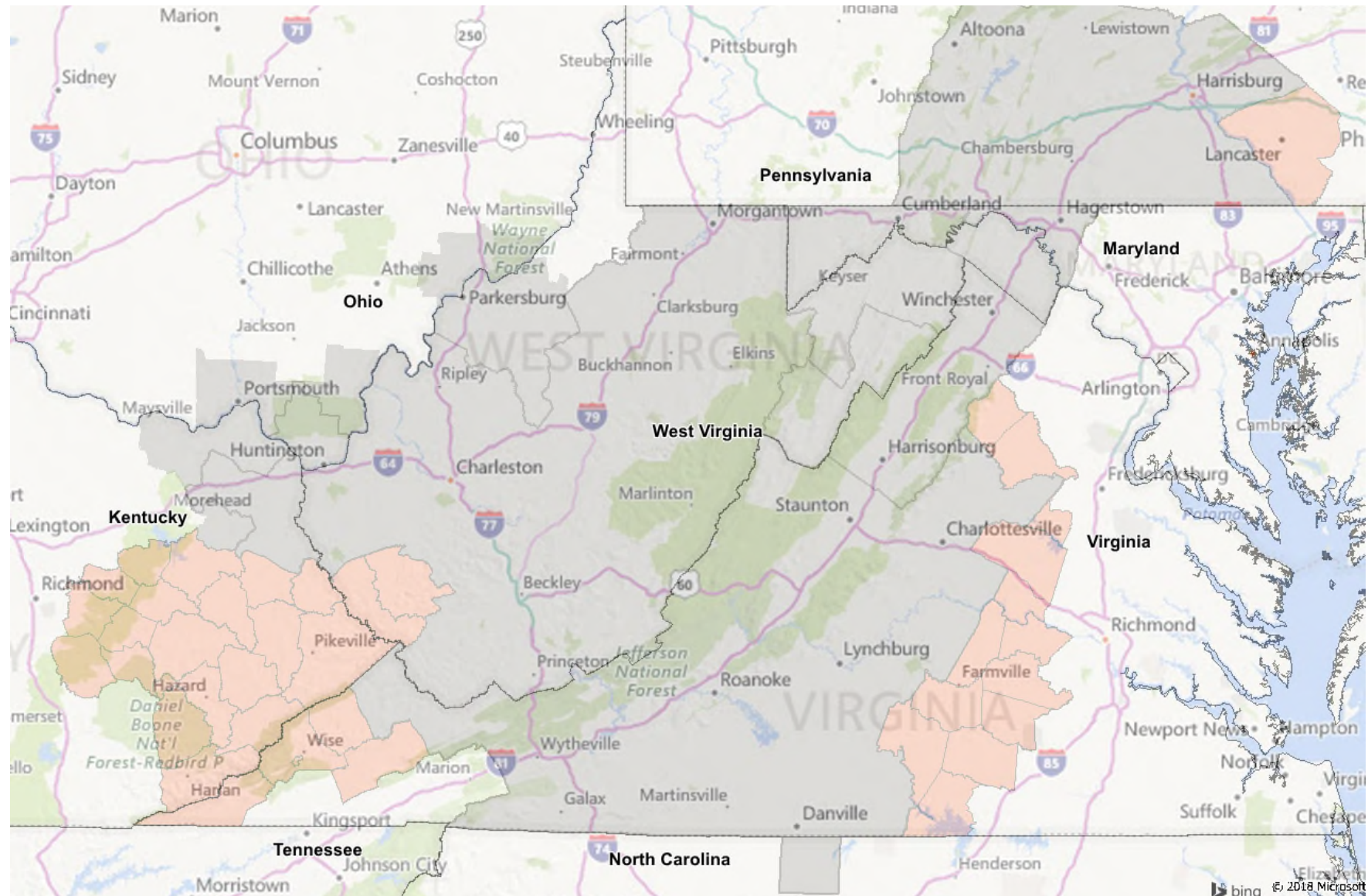
- 5.2 million covered POPs
- 953 thousand total subscribers
- 18.5% penetration of covered POPs
- 1,544 base stations

# Network Enhancements (Acquired nTelos Service Area)





# 2018 Wireless Network Expansion (Red)



- Examples of current job openings:
  - Supervisor, Tech Support (Lynchburg, Virginia)
  - Data Network Technician (Rustburg, Virginia)
  - IT Security Analyst (Waynesboro, Virginia)
  - Broadband Technician I (Omar, West Virginia)
  - Customer Service Representative (Buckhannon, Virginia)
  - Assistant Store Manager I (Charleston, West Virginia)
  - Graphic Designer (Edinburg, Virginia)
  - Fiber Technician (Oakland, Maryland)

Shentel will continue expanding wireless and broadband availability, and hiring local employees as part of that investment.