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VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c)
 WC Docket No. 18-141**

Uniti Fiber submits this letter in the above-referenced docket to outline its concerns with the Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks ("USTA Petition"). We are deeply concerned with the USTA Petition, and the burden it will place on our company if granted by the Commission.

Uniti Fiber is facilities based competitive network provider. The company deploys cell site back-haul and small cell solutions for the nation's wireless carriers, as well as "wired" data transport, Internet access, and other network solutions. The company currently operates 1.5 million fiber strand miles connecting over 16,000 customers across dozens of states. In addition to serving small businesses, enterprises, and residential customers, we also serve local governments, federal agencies, charities, and first responders. The company is also a leader in the E-Rate program, and connects hundreds of schools and libraries in many rural and remote locations primarily throughout the Gulf Coast region. A look at Uniti Fiber's network map (available at <https://uniti.com/network?map=fiber>) quickly demonstrates the breadth of our network. While we deploy in urban and suburban markets, we also serve many rural and hard to reach areas, many in areas that other providers cannot, or will not serve with high-capacity broadband services.

Uniti Fiber is concerned about the impact the USTA Petition proposal could have on our company's ability to deploy fiber and other network infrastructure to new areas, as well as our ability to continue to serve our existing customers. While we are foremost a "facilities-based" service provider, we nonetheless also use significant numbers of unbundled network elements to expand our reach, meet customer demands, and establish access to new markets. While we purchase numerous DS1s and DS3s, we rely especially heavily on dark fiber interoffice transport to allow us to interconnect distant central offices (and the local customers served through those central offices) to our network. While Uniti may be able to overbuild some of these routes, many are in locations and over geographic obstacles that would be extremely costly, if not impossible, for us to re-create. Without access to these network

elements, Uniti Fiber would lose access to some customers. Loss of these inputs would also necessarily change the way we enter new markets, and certainly in a way that would only serve to slow deployment of broadband, especially to remote and rural areas.

Uniti Fiber already faces numerous barriers when deploying network infrastructure including, but are not limited to, state and local permitting and regulatory delays, physical barriers to deployment like waterways where local departments of transportation prevent us from attaching to bridges and other infrastructure, and expensive and time-consuming challenges with many railroads to undertake deployments even at public rights-of-way crossings. A loss of unbundled network elements, or a significant increase in the rates that we pay for such network inputs, would needlessly add additional time, cost, and delay to an already difficult network deployment environment. And while these challenges will affect the way that we enter new markets, in many cases the loss of such elements will also directly result in the loss of service for some of our existing customers that we will simply be unable to reach with our own infrastructure, or be able to continue to serve under increased pricing pressure.

If granted, the USTA Petition will do nothing to further the Commission's goals of removing barriers to broadband deployment—rather, it will delay and prevent such deployments, which is likely to be felt acutely in rural and underserved areas where companies like Uniti Fiber rely on network inputs from other carriers to establish connectivity. We urge the Commission to consider the USTA Petition in light of the difficulties that it will place on an already heavily-burdened network deployment industry, especially with respect to dark fiber interoffice transport services which are absolutely critical to Uniti Fiber's ability to deploy services and other network elements to a wide swath of our customers.

Sincerely,



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Uniti Fiber

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