



Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

August 2, 2018

In the Matter of Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. & 160© to Accelerate
Investment in Broadband and Next-Generation Networks (Docket 18-141)

Dear FCC,

We are writing with regards to Category 1 of Docket 18-141. We have concerns about the repeal of mandates established by the Telecommunications Act of 1996 in 47 U.S.C. Code 251 (c)(3) and (4). We urge the commission to reject the petition in Docket 18-141, Category 1.

We are a municipal network designed as an open architecture, high-speed fiber network. We provide middle mile and last mile fiber for carriers such as AT&T, Cogent, GTT, First Communications, Bresco Broadband, OARnet and many others. Since the Medina County Fiber Network has gone into operation, we have seen a drastic drop in competitive prices and a consolidated move by most of the carriers in our area to move to fiber based services.

The ILEC in our geography offers copper services for Internet and voice. The ILEC backbone cannot support the types of services offered by commercial carriers using Medina County fiber. Unbundling, to allow local exchange carriers to bring competition, does not impede the development of telecommunications but, rather, accelerates fiber construction with lower prices.

Research shows that many other ILEC members of USTelecom are also investing in new technology, spurred on by the explosion of municipal networks and competitive access providers across the country over the past ten years.

Informal territorial agreements between ILEC's seem to prevent the competition that the competitive access providers have enabled. Additionally, unbundled carriers, and their services, have stirred improvements in service and the need to invest in advanced technologies.



The United States leads the world in innovation and design except in the Telecommunications Industry, where the United States is ranked thirteenth in the world. Continuing along traditional methods is detrimental to telecommunications development within our country. Unbundled Access creates competition that puts pressure on the ILEC's to upgrade their networks and provide access to new technologies.

Our type of municipal network is very healthy for our local community, which creates competitive pricing. Medina County companies, along with our community network, invest money back into the local economy for research and future development. Competition is what makes the United States a great Country.

We urge you to dismiss USTelecom's petition for forbearance from section 251 (c) Unbundling and resale requirements and related obligations and certain section 271 and 272 requirements.

Sincerely,

Bethany Dentler – Medina County Economic Development Executive Director

Gino Faciana – Medina County Port Authority Board Member

Adam Friedrich – Medina County Commissioner

Steve Hambley – State of Ohio House of Representatives

William F. Hutson – Medina County Commissioner

Ronald Paydo – Medina County Port Authority Board Member