LERMAN SENTER PLLC

WASHINGTON, DC

STEPHEN E. CORAN
202.416.6744
SCORAN@LERMANSENTER.COM

December 1, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554
Attention: Heidi Lankau

Re: Skybeam, LLC
FRN 0024062309
Rural Broadband Experiment
Marion, Kansas (SAC 416118)
WC Docket No. 14-259
SUBMISSION OF 15-MONTH REPORT; REQUEST FOR CONFIDENTIAL TREATMENT

Dear Ms. Dortch:

Pursuant to Paragraph 75 of the *Rural Broadband Experiment Order*,[1] Skybeam, LLC ("Skybeam") hereby submits the attached Certification and supporting documentation to demonstrate compliance with the 15-month build-out milestone for the above-referenced project.

Pursuant to Section 0.459 of the Commission's Rules, Skybeam hereby requests confidential treatment of certain of the information included herewith. In support, Skybeam provides the following information:

1. *Identification of the specific information for which confidential treatment is sought.* Skybeam requests that Exhibit A to the Certification (the "Information") be treated as confidential pursuant to Exemption 4 of FOIA[2] and Section 0.459, which protect confidential commercial and other information not routinely available for public inspection. The Information is competitively sensitive, business confidential and proprietary commercial information that would not routinely be made available to the public and has been carefully guarded from Skybeam's competitors. If the Information were disclosed, other parties could use it to determine information relative to Skybeam's business plans, operations and performance.

---

[1] *See Connect America Fund*, 29 FCC Rcd 8769 (2014) ("*Rural Broadband Experiment Order*").
[2] *See* 5 U.S.C. § 552(b)(4).

2. *Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission.* The Information for which confidentiality is requested concerns the rural broadband experiment proceeding, the requirements for which were adopted in the *Rural Broadband Experiment Order*.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.* The Information contains information on the locations of Skybeam's transmission facilities. It is competitively sensitive, business confidential and proprietary commercial information that would not routinely be made available to the public and has been carefully guarded from other parties.

4. *Explanation of the degree to which the information concerns a service that is subject to competition.* The Information includes information about the locations of Skybeam's transmission facilities and areas where Skybeam plans to deploy service. If the Information is not protected, competitors and would-be competitors could be able to use the Information to their competitive advantage.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.* Because the Information generally would not be subject to public inspection and would customarily be guarded from competitors, the Commission's rules acknowledge that release of the Information to the public is likely to produce competitive harm. Skybeam's competitors could assess aspects of its operations and determine the location of its facilities and customers to undermine Skybeam's deployment objectives and competitive position.

6. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure.* Skybeam maintains strict security concerning the location of its facilities and its future deployment plans. Only Skybeam and persons directly authorized by Skybeam have access to the data required to produce the Information.

7. *Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.* The Information is not available to the public and has not previously been disclosed to third parties.

8. *Justification of the period during which the submitting party asserts that material should not be available for public disclosure.* Skybeam requests that the Information be treated as confidential indefinitely because it is not possible at this time to determine any date certain by which the Information could be disclosed without risk of competitive harm to Skybeam.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.* If publicly disclosed, the Information would be extremely harmful to Skybeam's plans to deploy fixed broadband service using funds made available by the Commission.

Please contact undersigned counsel to Skybeam if there are any questions concerning this matter.

Respectfully submitted,

Stephen E. Coran

Enclosure
cc: Nissa Laughner

Skybeam, LLC
Marion, Kansas (SAC 416118)
Certification Regarding 15-Month Build-Out Milestone

Skybeam, LLC ("Skybeam" or "Company") submits this Certification pursuant to Paragraph 75 of the *Rural Broadband Experiment Order*[1] to demonstrate compliance with the 15-month build-out milestone for the Marion, Kansas project (SAC 416118) ("Market").[2]

The following exhibits are attached hereto for the Market to satisfy the Commission's requirements for rural broadband experiment recipients that elected the accelerated build-out option:

- Exhibit A – A map showing the geographic coordinates of Skybeam's towers and the funded census blocks in the Market, along with detail stating that Skybeam covers 43 percent of the project census blocks and 47 percent of the covered homes in the Market, well in excess of 25 percent of the number of required locations as established in the *Rural Broadband Experiment Order*. Exhibit A also includes explanations of the methodologies for calculating coverage and the percentage of locations covered, along with a list of covered census blocks. Community anchor institutions subscribing to Rise Broadband services are also listed.

- Exhibit B – A matrix showing Skybeam's standard "rack rate" pricing for its voice and broadband services that are available to each location in the Market. The network is capable of delivering 100 Mbps downstream/ 25 Mbps upstream and Skybeam offers at least one service plan that provides 25 Mbps downstream/5 Mbps upstream to all locations within the funded census blocks. Exhibit B provides information on the data limits Skybeam imposes for each service tier. Service meets the requirement that round trip latency be at or below 100 milliseconds.

- Exhibit C – Skybeam's promotional and marketing materials for the Market.

---

[1] *See Connect America Fund*, 29 FCC Rcd 8769 (2014) ("*Rural Broadband Experiment Order*"). *See also* FAQs for Rural Broadband Experiments, available at https://www.fcc.gov/general/rural-broadband-experiments.
[2] *See Public Notice*, "Rural Broadband Experiment Support Authorized for Ten Winning Bids for Skybeam, LLC, Consolidated Communications Networks, Inc., Delta Communications LLC, and Allamakee-Clayton Electric Cooperative, Inc., WC Docket Nos. 10-90 and 14-259, DA 15-897 (rel. Aug. 7, 2015). Skybeam submitted an interim report on October 29, 2015 for these four projects. The Wireline Competition Bureau subsequently authorized Skybeam for support for additional projects that, because on their date, were not subject to interim reporting in 2015.

I hereby certify that the foregoing is true and correct.

Pete Caputo,
Chief Information Officer,
Senior Vice President, Network Architecture,
Engineering and IT

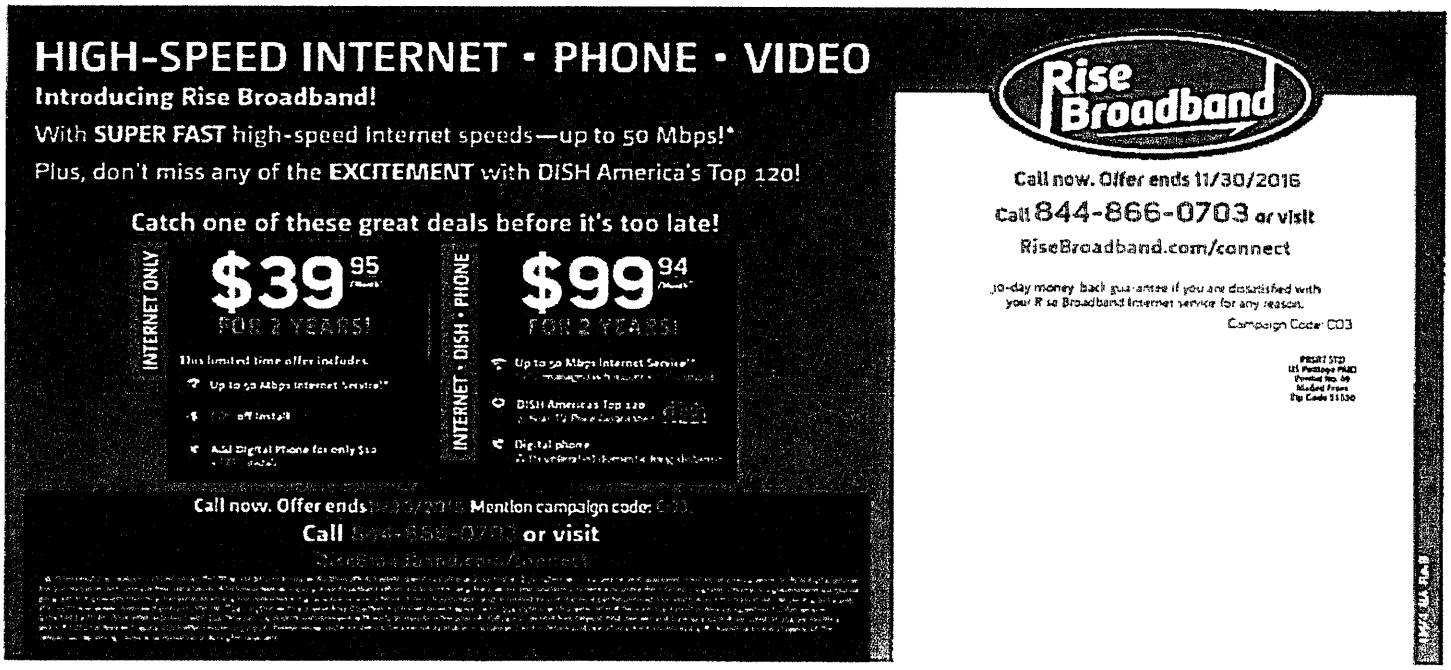
11/29/16
Date

Exhibit A

[Redacted from Public Inspection]

Exhibit B - CAF Pricing Matrix

					CAF Market Rack Rate Pricing				
Product	Speed	Code	Upload	Data Limit	IL	TX	KS	IA	NE
HSD	10 Mbps	LTE30	2 Mbps	150 GB	$62.95	$62.95	$62.95	$62.95	$62.95
HSD	25 Mbps	LTE31	5 Mbps	200 GB	$72.95	$72.95	$72.95	$72.95	$72.95
HSD	50 Mbps	LTE32	5 Mbps	250 GB	$85.95	$85.95	$85.95	$85.95	$85.95
VOIP w/Data Plan	N/A	VOPA1	N/A	N/A	$19.95	$19.95	$19.95	$19.95	$19.95
VOIP Stand Alone	N/A	TBD	N/A	N/A	$39.95	$39.95	$39.95	$39.95	$39.95
Equipment Rental (includes SM and Router)					$10.00	$10.00	$10.00	$10.00	$10.00

Exhibit C - Promotional Pricing - CAF Markets - Front

Promotional Pricing - CAF Markets - Back