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DELTA COUNTY, COLORADO
BOARD OF COUNTY COMMISSIONERS

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Dist. 1: C. Douglas Atchley - Dist. 2: C. Bruce Hovde - Dist. 3: J. Mark Roeber

March 26, 2014

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

Received & Inspected

APR 14 2014

FCC Mail Room

Ref: FCC Filing 10-90 03-07-2014 John Gavan 7521089796

Dear Ms. Dortch,

I am writing this letter to endorse Delta County Economic Development's letter of interest that was submitted for the FCC's Rural Broadband Experiment program.

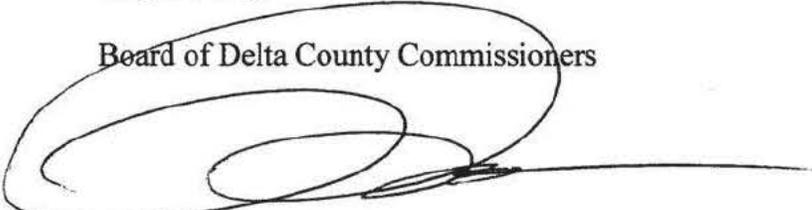
Delta County is a rural county on Colorado's Western Slope and we have long suffered from a dearth of broadband services. Large portions of our county are at best, under-served and at worst, un-served. We view improving our broadband services as vital to the economic well-being of our region. The FCC program appears to be tailored to situations such as ours and I see a very close fit between your objectives and our desires.

From the Delta County Economic Development letter (included) you will see that we have a very comprehensive proposal outlined. We have secured the potential participation by Delta Montrose Electric Association, our rural electric co-op, to provide the critical middle mile transport which is the key lynchpin around which the last mile providers can build their services. For the last mile, we have signed on Skybeam for fixed wireless last mile and OneTrack Communications for fiber based last mile services. In addition, we are proposing using TV White Space technology on a trial basis to fill the gaps where fiber and WiFi based fixed wireless cannot go. We see this as a great opportunity for the FCC to get more data about the efficacy of TVWS based last mile.

Thank you for considering Delta County for this program and I hope that you will look favorably on our request.

Respectfully,

Board of Delta County Commissioners



C. Bruce Hovde, Chairman

Enclosure: Delta County Economic Development's Letter of Interest

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DELTA COUNTY
ECONOMIC DEVELOPMENT

PO Box 627 ▲ Delta, Colorado 81416 ▲ Office: (970) 874-4992 ▲ Fax: (970) 874-4995

Ms. Marlene Dortch
Secretary
Federal Communications Commission

March 7, 2014

Subject: Expression of Interest - FCC Rural Broadband Experiments

Dear Ms. Dortch:

Delta County Economic Development in conjunction with Delta Montrose Electric Association, JAB Wireless, OneTrack Communications, Clearnetwork, the Delta County School District and the Delta County Library District are pleased to submit this letter of interest to participate in the FCC Rural Broadband Experiment.

Delta County is a relatively poor rural county located in Colorado's Western Slope region. We suffer from vast expanses of unserved and underserved territory with low population density coupled with very challenging terrain. Our incumbent service providers have been very reluctant to extend services to wider population of subscribers due to these factors. We currently have large portions of the county that are unserved except by slow and expensive satellite providers. The remainder of our subscribers are limited to services that in most cases, fail to meet the Federal definition of broadband (4 Mbps down/1 Mbps up).

The following paragraphs describe our proposed support approach for the FCC Rural Broadband Experiment. This concept of operations is in an early stage of development and we are currently speaking with other entities to see if they will join in this project.

1. Service Provider Organizational Structure

We propose a partnership that includes the following organizations. We are also seeking a fiber optic services firm to round out our offerings to include FTTB/C services.

Delta County Economic Development (DCED) – DCED will serve as the overall project sponsor and project coordinator. We recognize that improving broadband services in our county is one of the most critical factors for driving economic development and for this reason, DCED has been supporting broadband service improvements for many years.

Delta Montrose Electric Association (DMEA) - Delta Montrose Electric Association (DMEA) – DMEA is our rural co-op electric provider. DMEA is in the process of constructing a fiber optic network for the purpose of providing enhanced

data communications to its electric substations. This fiber optic network may have future potential to provide gigabit rate middle-mile connectivity to many areas throughout the county. Making capacity available on this network is subject to DMEA board approval.

JAB Wireless (Skybeam parent company) – JAB (Skybeam) is one of the largest Wireless Internet Service Providers in the US. They have an active presence in Delta County and have expressed interest in participating in this experiment.

OneTrack Communications and Clearnetworx – OneTrack is a fiber facilities installation firm that operates across the Western Slope of Colorado. Clearnetworx is a fiber based ISP who works with OneTrack on many projects. Clearnetworx has experience in deploying active and passive FTTB/C solutions.

2. Experiment Scope

We envision creating a comprehensive set of middle-mile and last-mile services that will be based on the latest technology. We plan to include the following last mile distribution technologies in this experiment:

a. Last-mile distribution technologies

Fiber to the home and business (FTTB/C) – The DMEA middle mile network will extend to electric substations located in close proximity to each of the towns in Delta County. In light of this close proximity to town centers, we would like to deploy G-PON based gigabit rate fiber optic network facilities in all or some of the towns. This last mile service will be targeted at businesses but we would also like to conduct several consumer trials as well.

Fixed Wireless – For subscribers that lie outside of towns, as well as those in town but out of reach of FTTC services, we would like to deploy point to multi-point fixed wireless last-mile services using 900 Mhz, 2.4 and 5 Ghz wifi technology.

TV White Space (TVWS) – We have previously conducted a small trial of TVWS technology and have found this wireless last-mile transport very useful in situations where higher frequency services cannot penetrate obstructions or secure a successful radio path. Our mountainous terrain and heavy tree canopy make TVWS an attractive alternative for some users. We view this technology as particularly interesting for experimentation.

b. Geographic Coverage

The Experiment is proposed for Delta County, Census Tract 8029964800.

We tentatively view the geographic scope of this project as serving the following towns in Delta County and the surrounding un-incorporated areas outside of these towns:

- Delta, CO (County Seat)
- Cedaredge, CO
- Hotchkiss, CO
- Paonia, CO
- Crawford, CO

c. Participating Community Anchor Institutions

The following Community Anchor Institutions (CAI's) have a gaping need for higher capacity broadband services and are interested in participating in this program:

- Delta County School District (18 locations)
- Delta County Library District (5 locations)
- The potential exists to include local government facilities in addition to those listed above.

d. Service Offerings

The following services are in scope for this experiment

- Basic Phone Service with E911 capability
- Internet Access

3. Timeline

We propose the following tentative timeline for this project. The DMEA middle-mile network construction is planned to complete by end of year 2014 and this will be the pacing item for launching this experiment. Based on this, we envision the following high level schedule:

Submit letter of intent – March 7, 2014

Submit final application – May 2014

Begin technical planning – August 2014.

Complete technical planning – October 2014

Order equipment/begin construction – November 2014

Network Testing – December 2014 – January 2015

Service Activation – February 2015

4. Cost Estimate

Cost estimation has not yet been fully completed, but we have compiled the following high level estimates as of present:

Network interface equipment at substations –	\$ 400k
Perfection of rights of way -	\$ 400k
Towers, Access Points at each town (6 sites) -	\$ 600k
G-PON fiber deployment in four towns -	\$ 1,000k
	<hr/>
Estimated total	\$ 2,400k

5. Service Pricing

At this time, we have not established pricing for the proposed services but we believe that the pricing should be relatively equivalent to similar service levels in the metropolitan and suburban areas of Colorado. We will conduct a comparative survey of such service pricing in the Denver metro area to use a basis for our final pricing schedule.

6. Point of Contact

For questions about this application or other information, please contact:

Delta County Economic Development
Attn: John Gavan
P.O. Box 627
Delta, CO 81416

Phone: (970) 874-4992

Ms. Marlene Dortch
March 6, 2014
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We believe that the plan described above is comprehensive, multi-faceted and capable of delivering real world experience that will be useful to other rural areas. We have a pool of experienced individuals who stand ready to support and manage this experiment and insure its success. Additionally, we have the support of our local town and county governments, our community anchor institutions and the general public. As a result, we feel that Delta County would be an excellent site for this experiment.

Sincerely,

A handwritten signature in cursive script, appearing to read "John Gavan".

John Gavan