

# Strategies Law Group, PLLC

September 30, 2015

## VIA EFCS

Ms. Marlene J. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Notice of Ex Parte Communication- *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Connect America Fund*, WC Docket No. 10-90.

Dear Ms. Dortch:

On Wednesday, September 29, 2015, Robert Nichols, Chief Executive Officer of Declaration Networks Group, Inc. ("Declaration") and Brian McDermott of Strategies Law Group, PLLC, outside counsel for Declaration, participated in a meeting at the Federal Communication Commission with Alexander Minard, Heidi Lankau and Katie King of the Federal Communication Commission's Wireline Competition Bureau to discuss the timing and process of the next phase of the Connect America Fund ("CAF") grants.

During the discussion, Declaration updated staff on its roll out activities in the Eastern Shore of Virginia in the counties of Accomack and Northampton and its recently announced entry into Garrett County, Maryland. Declaration shared its current marketing materials, as well as, the press release announcing the Garrett County public/private partnership. A copy of these materials are attached.

The discussion focused on the timing of the next phase of the CAF grants and the logistics of how the qualification process will work for future auctions. Declaration discussed the timing of obtaining any necessary ETC designation in connection with the CAF grant process.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed via ECFS with your office, and a copy of this submission is being provided to the meetings attendees.

Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,



Brian McDermott

Counsel for Declaration Networks Group, Inc.



Connect to what matters.  
Finally! The fastest and most reliable Internet connection you've ever experienced. NeuBeam is a revolutionary broadband service that connects you to the online world in ways you've never imagined.

SIGN UP LEARN MORE

At NeuBeam™, a service of Declaration Networks Group, we believe that where you live shouldn't limit your access to today's connected world. That's why we are building a strong and reliable network to provide people in rural communities with high-speed Internet service at affordable prices, something that was previously available only in more densely populated metropolitan areas.

Different households have different needs. Our plans are designed to accommodate different levels of demand families might have. All our customers can get online quickly from any device—computer, smartphone or tablet—and enjoy the same quality of service without interruptions or delays. Our network is built on a foundation of advanced broadband technology delivering next generation services. And our customer service and technical support are local and available to help make certain your NeuBeam service allows you to **connect to what matters.**

<p><b>BASIC BEAM</b></p> <p><b>\$50/mo</b></p> <p>SPEED DOWN/UP <b>5Mbps / 5Mbps</b></p> <p>CONTRACT TERM 12 month contract</p> <p><b>BEST FOR</b> Single User Household with Light Usage, up to 2x Faster than DSL, No Data Caps</p> <p>SIGN UP</p>	<p><b>BASIC BEAM PLUS</b></p> <p><b>\$60/mo</b></p> <p>SPEED DOWN/UP <b>10Mbps / 5Mbps</b></p> <p>CONTRACT TERM 12 month contract</p> <p><b>BEST FOR</b> Multiple User Households with Moderate Usage, 3-4x Faster than DSL, No Data Caps</p> <p>SIGN UP</p>	<p><b>POWER BEAM</b></p> <p><b>\$75/mo</b></p> <p>SPEED DOWN/UP <b>20Mbps / 10Mbps</b></p> <p>CONTRACT TERM 12 month contract</p> <p><b>BEST FOR</b> Multiple User Households with Heavy Usage, 7-8x Faster than DSL, No Data Caps</p> <p>SIGN UP</p>	<p><b>POWER BEAM PLUS</b></p> <p><b>\$100/mo</b></p> <p>SPEED DOWN/UP <b>30Mbps / 10Mbps</b></p> <p>CONTRACT TERM 12 month contract</p> <p><b>BEST FOR</b> Small Businesses / Telecommuters, 10x Faster than DSL, No Data Caps <i>Not available in all areas</i></p> <p>SIGN UP</p>
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Equipment & Installation\*\*\*

<p><b>INSTALLATION</b></p> <p><b>\$99</b></p>	<p><b>EQUIPMENT</b></p> <p><b>\$199</b></p>
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\* One year commitment term with automated renewal of pricing for 2nd year and 90 day cancellation notice.  
\*\* Power Beam Plus not available in all areas.  
\*\*\* Installation establishes single point of interconnection and Wi-Fi inside the property. Any additional inside wiring costs that are beyond the scope of the standard installation, and which are agreed to by the customer, will be the customer's responsibility.



## Garrett County, MD and Declaration Networks Group Announce Landmark Public/Private Partnership to Eliminate the Digital Divide

Innovative Federal, State, County and Private Industry Collaboration Creates a Model to Accelerate Next-Generation Broadband in Rural America

OAKLAND, Md. and VIENNA, Va., Sept. 15, 2015 /PRNewswire/ -- Garrett County, MD and Declaration Networks Group, Inc. (DNG) have entered into a long-term agreement that establishes funding for deployment of a state-of-the art broadband network infrastructure with compelling economics to deliver high-speed Internet services to more than 3,000 unserved, or underserved homes and businesses.

The initiative was jointly developed by Garrett County and the Appalachian Regional Commission (ARC), who have both committed grant funding to the effort. DNG was selected as the private industry partner by the County through a competitive bid process. This groundbreaking partnership provides an effective model to stimulate broadband investment for other communities to adopt across the country.

Paul Edwards, chair of Garrett County's board, said, "This partnership with DNG marks an important milestone for our County, and it will provide an immediate positive impact to the unserved and underserved residents, and a sustainable infrastructure that will benefit the region, support its economy and enrich the value and appeal of visiting and living in Garrett County."

DNG establishes broadband networks for local communities, leveraging technologies best suited for local service areas and users. Bob Nichols, CEO of DNG, said, "DNG is excited to join with Garrett County and ARC to create an innovative broadband ecosystem that will address the digital divide for families in rural communities, stimulate the local economy, and enhance the quality of life for all its citizens."

DNG will begin its network deployment later this year, leveraging existing fiber networks and unlicensed spectrum allocated by the FCC to efficiently support the use of high quality broadband services. DNG has been a leader in developing broadband networks and pioneering wireless technologies, including TV White Space frequencies which will be deployed in much of the unserved parts of the County to address the challenging mountainous terrain and heavy foliage. DNG will operate the network under the service name, NeuBeam™, providing high-speed services at very competitive prices.

While Garrett County enjoys a vibrant year-round tourism economy, strong agricultural sector and growing business community, many Garrett County residents and businesses are not able to participate in today's digital economy due to the lack of broadband infrastructure. Earl Gohl, Federal Co-Chair, ARC, said, "ARC sees its investment of federal funds in the Garrett County broadband project as an investment that will help make Garrett County more competitive in the 21st Century Information Economy. Through this initiative, Garrett officials are creating a model which will benefit their county for decades to come and which other areas are sure to follow."

Garrett County's broadband initiatives have also been supported by a multi-year consulting contract with CTC Technology/Energy Inc. based in Kensington, MD. CTC developed the County's Broadband Feasibility Study and Implementation Plan in 2012, defining the multi-year technology plan culminating in the Public Private partnership being announced today.

Joanne Hovis, President of CTC said, "We are thrilled to have played a role supporting Garrett County, ARC and DNG in reaching this milestone, and look forward supporting the deployment of this pioneering network."

For more info about DNG, go to [www.declarationnetworks.com](http://www.declarationnetworks.com) and [www.neubeam.com](http://www.neubeam.com).

For more info about Garrett County, go to [www.garrettcountry.org](http://www.garrettcountry.org).

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