

protocol-agnostic and supportive of interfaces with Ethernet, SONET, and Fiber Channel-based services.

OWB links can be an important alternative or supplemental technology choice to provide rapid service delivery of high-bandwidth access to fiber optic or wireless networks, as well as where links are needed for redundancy, campus or metropolitan area networks, or to restore communications during disaster recovery operations.

Commissioner Copps has previously noted that access to adequate and affordable middle mile broadband facilities “is a necessary precursor to a provider’s being able to deploy broadband services to its customers.”¹ While cost, capacity, and timing concerns all affect the deployment of and access to such facilities,² OWB offers significant promise for rapid and low-cost deployment of substantial middle mile and second mile capacity. For example, whereas timing constraints associated with permits and construction and/or the associated capital resources required may preclude a second mile fiber-to-the-node (“FTTN”) build within a sparsely populated rural exchange, OWB can be deployed quickly in the same area with a relatively minimal capital investment in equipment. As another example, a provider could use OWB as a middle mile complement to a second mile FTTN deployment -- a provider who has recently deployed FTTN may naturally become concerned about potential bottlenecks in the middle mile, and the deployment of OWB as a supplement to or replacement of existing interoffice transport could save the provider months of waiting for permits and the substantial capital expenses associated with trenching once those permits are in hand. The same holds true

¹ Michael J. Copps, Acting Chairman, Federal Communications Commission, Bringing Broadband to Rural America, Report on a Rural Broadband Strategy ¶ 114 (May 22, 2009) (“*Rural Broadband Report*”).

² See, e.g., *id.* at ¶ 113 (discussing the costs of deploying broadband in rural areas); Staff Report on the National Broadband Plan, September 29, 2009, at 50-51 (discussing the “significant impact” of right-of-way and pole attachment costs on fiber deployment, as well as the “make-ready delays” of up to 18 to 24 months).

for OWB as an alternative or complement to microwave backhaul, allowing providers to avoid or minimize the time associated with obtaining licenses and the costs associated with roof leases.

Respectfully submitted,

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