



This is life. Connect with it.

July 24, 2013

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**RE:** WT Docket No. 12-69, *Promoting Interoperability in the Lower 700 MHz Commercial Spectrum*

Dear Ms. Dortch:

Horry Telephone Cooperative, Inc. (HTC) writes to urge the Commission to immediately restore interoperability to the Lower 700 MHz Band. If the Commission acts *soon* to restore interoperability, HTC will be able to initiate plans to extend LTE coverage to almost 1.1 million residents across the Carolinas, including low-income and minority communities, at competitive prices.

HTC is the nation's largest telecommunications cooperative, and its 18th largest telephone company. Founded in 1952 to deliver telephone service to rural Horry and Georgetown Counties in South Carolina, HTC has served as a local communications leader to rural South Carolina for more than 60 years. HTC has a long history of delivering communication services to residents of rural Horry and Georgetown Counties when other, larger companies deem the area not profitable enough to serve, including wireline plain old telephone service (POTS), cable television, high speed broadband and most recently digital wireless service. HTC Wireless began offering 100% digital wireless voice service in 1996, and continues to build wireless broadband networks so its customers can take advantage of 3G and 4G mobile data offerings.

HTC participated in Auction 73, winning the 700 MHz Lower A Block license covering its core service area and nine adjacent counties (WQIZ561) for \$8.469 million in Round 172.<sup>1</sup> HTC participated in the Lower 700 MHz auction with the expectation, as had been the case in auctions past, that service would be interoperable throughout the band. Today, more than almost five years following that auction, the A Block licensees remain victimized by a lack of interoperability. HTC, in its most recent 700 MHz Performance Status Report, noted that

---

<sup>1</sup> FCC Auctions: Summary: Auction 73, [http://wireless.fcc.gov/auctions/default.htm?job=auCTION\\_summary&id=73](http://wireless.fcc.gov/auctions/default.htm?job=auCTION_summary&id=73) (last visited July 2, 2013) (click on the "as shown in the Integrated Spectrum Auction System" link available in the "Summary" section of the page).

**HORRY TELEPHONE COOPERATIVE, INC.**

Post Office Box 1820 / Conway, South Carolina 29528-1820 / (843) 365-2151 / FAX: (843) 365-1111 / [www.htcinc.net](http://www.htcinc.net)

“several obstacles exist which could impede meaningful deployment of the License, including the lack of interoperable devices available for A Block licensees . . . .”<sup>2</sup>

As indicated above, HTC was founded to provide telecommunications services to rural, low-income customers that large corporations neglected. Unfortunately, far too many residents of the Carolinas still don’t have access to affordable, quality telecommunication services. Interoperability and utilization of our 700 MHz Lower A Block license will enable HTC to provide much needed services to many of these low income, high unemployment areas that require and deserve so much better.

Dillon and Marion Counties, both in northeast South Carolina, are places where, if deployed, HTC could utilize the Lower 700 MHz A Block to provide low-cost telecommunications and broadband services. The median household income for Dillon County between 2007 and 2011 was \$26,067, and during that same time one in every three people (33.6%) lived below the federal poverty level.<sup>3</sup> The unemployment rate for Dillon County in 2011 was 15.3%.<sup>4</sup> Neighboring Marion County had a median household income of \$31,762 for the same period, with 24.2% of the population living below the federal poverty level.<sup>5</sup> The unemployment rate for Marion County in 2011 was 19.5%, the highest of any county in South Carolina.<sup>6</sup> In 2012 both Dillon and Marion Counties had much higher “Black or African American alone” population percentages than the national average;<sup>7</sup> both are majority-minority counties, and in Marion County, less than 40% of the population is categorized as “White alone, not Hispanic or Latino.”<sup>8</sup>

---

<sup>2</sup> Horry Telephone Cooperative, Inc. 700 MHz Performance Status Report for Station WQIZ561 (filed through ULS on Jan. 12, 2012).

<sup>3</sup> Dillon County QuickFacts from the US Census Bureau, <http://quickfacts.census.gov/qfd/states/45/45033.html> (last visited July 22, 2013) (Dillon County QuickFacts).

<sup>4</sup> Dillon County Profile, South Carolina Association of Counties, <http://www.sccounties.org/Data/Sites/1/media/services/Research/profiles/dillon.htm> (last visited July 22, 2013).

<sup>5</sup> Marion County QuickFacts from the US Census Bureau, <http://quickfacts.census.gov/qfd/states/45/45067.html> (last visited July 22, 2013) (Marion County QuickFacts)

<sup>6</sup> Marion County Profile, South Carolina Association of Counties, <http://www.sccounties.org/Data/Sites/1/media/services/Research/profiles/marion.htm> (last visited July 22, 2013).

<sup>7</sup> Compare Dillon County (46.3%) and Marion County (56.1%) with United States (13.1%) figures. See Dillon County QuickFacts; Marion County QuickFacts; USA QuickFacts from the US Census Bureau, <http://quickfacts.census.gov/qfd/states/00000.html> (last visited July 22, 2013).

<sup>8</sup> Marion County QuickFacts.

While HTC would like to provide competitively priced wireless broadband and telecommunications to these counties and others like it throughout its rural service area, the lack of full interoperability of the Lower 700 MHz Band A Block remains a key obstacle to deployment. Resolving the interoperability to the Lower 700 MHz band would help facilitate HTC's deployment of LTE services on beachfront spectrum. Accordingly, HTC respectfully requests that the Commission immediately adopt an order restoring interoperability to the Lower 700 MHz. This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

A handwritten signature in black ink that reads "Michael Hagg". The signature is written in a cursive, flowing style.

Michael Hagg  
Chief Executive Officer

cc (via email): Chairwoman Mignon Clyburn  
Ms. P. Michele Ellison  
Mr. David Grimaldi  
Mr. Louis Peraertz  
Ms. Ruth Milkman  
Mr. Sean Lev