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LAURENS MUNICIPAL POWER & COMMUNICATIONS

September 3, 2013

Filed via ECFS

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

Dear Ms. Dortch:

Pursuant to 47 C.F.R. §§ 1.4 and 1.405, Laurens Municipal Broadband Communications Utility, a rural competitive local exchange company hereinafter referred to as Laurens, files this statement supporting in part and opposing in part the Fiber-to-the-Home Council Americas' Petition for Rulemaking to Establish a Gigabit Communities Race-to-the-Top Program.

Laurens is established in Iowa as a rural municipal communications utility and boasts an average service penetration level of more than 75%. It offers a very competitive triple play to its citizens and survives on its exceptional customer service. Customers receive same day service for new offerings or repair. Since inception, this municipally owned utility has surpassed the incumbent, Century Link and all competitors. In 1998, the citizens of Laurens voted to bring voice, video and Internet services to their small community, to be provided by the utility. They decided to overbuild their rural town with a cable coax system and a fiber ring supporting the transport of services. This infrastructure can yet provide digital video, voice and high speed Internet of more than 25 mbps to the homes and businesses. This municipal utility now wishes to expand to help small communities next door with broadband services. Laurens is an ETC operating on very tight budget constraints and with no Federal Universal Service Support. Its infrastructure will need to be updated, in the near future, in order to support ultra-high-speed gigabit service. Given its exceptional track record in serving businesses, clinics, schools and citizens in rural Iowa, Laurens should be considered for future funding to support gigabit services to support rural municipal communities in Iowa.

Conceptually, Laurens supports the proposal of the Fiber-to-the-Home Council ("the Council") and the diversion of the Connect America Fund monies, which have been rejected by price cap carriers refusing to build broadband-capable infrastructure in rural, high-cost area, to carriers willing to provide broadband service in these areas. However, Laurens believes that the smaller, more rural towns where fiber facilities are lacking should not be overlooked in this process in favor of ultra-high-speed gigabit service in a few select communities. Rather, in the event this Petition results in a rulemaking, the Commission should consider funding more projects of a smaller scope with smaller rural towns given priority.

Furthermore, Laurens opposes the Council's proposal that entities that are not Eligible Telecommunications Carriers ("ETCs") should be considered for funding. Section 254 is patently clear that a carrier must have ETC designation to receive universal service funding, and with the funds for the Catalyst Fund coming from redirected CAF funding, it would be impermissible for the Commission to give any reclaimed CAF funds to non-ETCs. Without ETC designation of the carriers receiving any funding, the Commission would not have any way to perform meaningful oversight of the CAF funding.

For the reasons asserted herein, Laurens Municipal Broadband Communications Utility supports in part and opposes in part the petition of the Fiber-to-the-Home Council Americas.

Respectfully submitted,



Chad Cleveland, General Manager
Laurens Municipal Broadband Communications Utility

cc: Heather B. Gold, President, Fiber-to-the-Home Council Americas
Thomas Cohen, Counsel to the Fiber-to-the-Home Council Americas

I, Chad Cleveland, certify that on, September 3, 2013, I served the foregoing statement by placing true and correct copies in the United States mail enclosed in sealed envelopes with postage fully prepaid, addressed as follows:

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Signature

Chad Cleveland
Type or Print Name