



March 6, 2014

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

RE: WC Docket No. 10-90 / Rural Broadband Expression of Interest ("EOI")

Dear Commissioners:

Please accept this as our submission of an expression of interest ("EOI") for the rural broadband experiments as described in the current docket mentioned above under consideration. As additional information included in our submission, please review the following categories that generally includes the past and current overview of our company and how the future concept may benefit our existing and proposed customer bases in our service areas.

Background

ComSpan Communications, Inc., ("ComSpan") is an Oregon domestic business corporation and a certified competitive local exchange carrier ("CLEC") overseen by the Oregon Public Utilities Commission ("OPUC") and maintains several fiber-optic cable rings and many direct lateral spurs providing fiber access to about 5,000 business and residential properties in several high-cost and underserved rural communities in southwestern Oregon. ComSpan was formed in 1998 as a traditional switch-based CLEC after the implementation of the Telecommunications Act of 1996 that initially relied on last-mile access to its customers through unbundled network elements ("UNEs") from the incumbent local exchange carrier ("ILEC"). However, the ILEC's facilities in ComSpan's serving areas continue to be unimproved copper outside plant facilities with little likelihood of any further significant investment to upgrade those facilities. Existing ILEC facilities are limited in their abilities to provide high-speed data services. In 2007 ComSpan made a substantial financial commitment for a long-term market presence to install its own fiber-optic cable outside plant facilities in four relatively remote communities in a former General Telephone ("GTE") franchise area, which was acquired by Verizon, then subsequently divested to Frontier Communications. As a result of the discontinuity of ownership and no real investment in the ILEC infrastructure, ComSpan continues to be the only company providing fiber-to-the-premise ("FTTP") to business properties, and fiber-to-the-home ("FTTH") in all economic strata in the towns of Bandon, Myrtle Point, Coquille and Reedsport. ComSpan's services include traditional telephony services, high-speed data connections and other managed network services ("MNS") to help customers realize additional applications. ComSpan is also a full triple-play provider for voice, data and video since it has built a video headend and satellite earth station in Bandon, which also serves as our central office location. ComSpan is one of only two wireline CLECs designated as an eligible telecommunications carrier ("ETC") in the State of Oregon.

ComSpan Communications, Inc., 278 NW Garden Valley Road, Roseburg, Oregon 97470

Geographic Territory

ComSpan’s FTTP and FTTH markets are located in southwestern Oregon in Coos County and Douglas County. Under this proposed plan, ComSpan would also expand into neighboring Curry County. The main economic center of this area is Coos Bay, which is a port city, but has economically suffered due to the downturn of the timber industry. The City of Coos Bay, combined with the neighboring community of North Bend, is the largest city on the Oregon coast and has a combined population of about 16,000 residents. The surrounding less populated areas served by ComSpan are Bandon, Coquille, Myrtle Point and Reedsport. These communities have realized a more severe economic decline, in varying degrees, due to their traditional dependence on the timber industry both as an employment base and tax base. As a result, ComSpan’s existing infrastructure is an important element of any economic development plan in the area, which will require further broadband development into other communities, including those in Curry County, which lies to the south of the current service areas and extends to the California border.

ComSpan currently serves in the existing census tracts:

County	Census Tract
Coos	41011001000
Coos	41011000900
Coos	41011001100
Douglas	41019020000

ComSpan proposes to serve the existing and new following census tracts:

County	Census Tract
Coos	41011000100
Coos	41011000200
Coos	41011000502
Coos	41011000700
Coos	41011000800
Coos	41011000900 ¹
Coos	41011001000 ¹
Coos	41011001100 ¹
Curry	41015950100
Curry	41015950200
Curry	41015950301
Curry	41015950400
Douglas	41019010000
Douglas	41019020000 ¹

¹ Existing census areas served requiring expanded network to contiguous rural areas

Anchor Institutions

ComSpan currently provides FTTP services to the City of Bandon, City of Myrtle Point, Myrtle Point School District, City of Coquille, Coquille School District, and the Lower Umpqua Hospital in Reedsport among other critical municipal, health and law enforcement institutions.

Proposed Technology

ComSpan proposes to extend the current fiber-optic backbone network reaching the contiguous unserved or underserved locations within the existing towns' boundaries and its adjacent and more rural geographical areas. The fiber-optic backbone network and local fiber distribution network provides broadband services at an affordable price to the consumer. The current basic data services, which is the proposed minimum threshold for data services, is thirty megabits per second ("30Mbps"), which would uncharacteristically be synchronous for both upload and download speeds. Since ComSpan maintains all its access and supporting network elements, it can essentially provide unlimited speeds to more demanding customers, especially those potential employers who can be attracted to the area due to the existing and proposed infrastructure. Providing One Gigabit ("1 Gig") service would simply be a matter of internal controls and configuration to the end user. ComSpan continues to maintain and further proposes a backbone and distribution network exclusively comprised of fiber-optic cable due to the extremely wet and harsh weather conditions of southwestern Oregon. Specifically, this area is affected by both large amounts of rainfall and corrosive salt water elements that either interferes with, or is caustic to copper wire and coaxial cable outside transmission media.

Existing Providers

The ILEC, Frontier Communications, also provides basic voice and data services. Voice is provided using analog transmission over traditional copper twisted-pair. Data services are limited to asynchronous digital subscriber loops ("ADSL"), which has limited capacity and data speeds are affected over copper beyond a certain distance from the ILEC's wire center. The local franchise cable television operator, Charter Communications, also offers basic phone and data services bundled with their video offering via coaxial cable.

State and/or Local Support

ComSpan is not receiving any broadband funding from either the state or federal governments. It is, however, participating as a leader in an economic development plan for the town of Myrtle Point, the most distressed community. ComSpan is working with others, including Oregon Main Street and New City, to help define an economic and broadband development plan.

Project Timeline

As an established operator who already maintains existing outside fiber-optic cable plant and ancillary facilities, ComSpan would begin approved market expansion without delay. Following a three to six month bidding process, ComSpan would complete a comprehensive set of construction plans; initiate the building permit process; negotiate any necessary rights-of-ways; select a qualified general contractor; and commence construction.

Proposed Phases

ComSpan proposes a five-phase approach. The first phase (Phase I) will be the development of a comprehensive set of construction plans requiring substantial engineering and network design. The second phase (Phase II) would be to enhance our existing backbone and FTTP and FTTH distribution networks to reach the immediate outlying rural areas of Bandon, Coquille, Myrtle Point and Reedsport, including an expansion of underserved areas in Coos Bay and North Bend. The third phase (Phase III) would be to leverage our intercity networks, both owned and leased, to serve those rural communities that are located among, but between certain existing investments in network assets. The fourth phase (Phase IV) would be to extend our existing network locations, from those created in prior phases. The fifth phase (Phase V) would be to build into those most remote communities, but access to these last areas would have been strategically considered through the planning and implementation of the previous four phases.

Scalability

ComSpan is uniquely positioned to upgrade its existing network and expand into neighboring communities. It already maintains a central office and data center in Bandon; maintains relationships with local power authorities for pole attachments and conduit access; benefits from an existing and financially bonded interconnection agreement with the ILEC for pole attachments; maintains a small fleet of construction and repair vehicles; employs experienced fiber-optic cable technicians; can quickly enhance its construction and technician base through existing subcontractor relationships; can leverage its existing network operations center; and simply offer voice, data and video services with insignificant capital expenditures due to these previous investment.

Total Utility Investment

Since 2007, the shareholders of ComSpan have invested over thirty million dollars (\$30,000,000) to the current central offices; data centers; remote utility huts; uninterrupted power supply; and, most notably, the existing fiber-optic backbone and distribution networks, including other diverse long-term fiber-optic network leases ("IRUs") on other backbone carriers to provide network security and redundant routes. The proposal would extend the current network to more rural areas that can be reached by benefiting from leveraging ComSpan's existing network. ComSpan proposes to invest in its fiber-optic cable backbone and local fiber-optic distribution networks to expand the surrounding communities of Bandon, Coquille, Myrtle Point and Reedsport. These existing assets provide the foundation for serving the rural communities between these towns, plus expand in less populated communities such as Powers, Lakeview, Port Orford, Gold Beach, Brookings, and similar communities.

One-Time Infrastructure Investment Needed

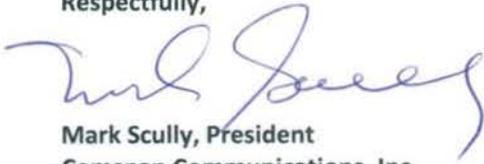
The estimated total investment needed to further expand reliable broadband access to the communities addressed herein and adhering to the technical standards and transmission media described herein is sixty four million dollars (\$64,000,000). ComSpan would invest up to ten million dollars (\$10,000,000) in a combination of cash and in kind investment as follows:

Contribution by ComSpan Restricted for Infrastructure Construction:	\$ 10,000,000
Other One-Time Contributions Restricted to Final Plan:	\$54,000,000
Total Project Cost:	\$64,000,000

Summary

ComSpan is an existing CLEC and ETC that has already significantly invested in certain underserved rural communities in southwestern Oregon. Comspan can leverage its fiber-optic cable network , its central office and switching assets, its video headend and satellite earth station, its own and subcontracted construction and repair fleet, and, most valuably, its current personnel that manages outside plant assets, the network operations center and all supporting billing, trouble tickets, maintenance, accounting and other administrative functions. The overview discussed above is well suited to be integrated into ComSpan's existing business since it will be mostly incremental to current operations and procedures.

Respectfully,

A handwritten signature in blue ink, appearing to read "Mark Scully".

Mark Scully, President
Comspan Communications, Inc.