



Wallowa Valley Networks

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(888)268-1513  
Oregon CLEC #8553

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March 6th, 2014

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

Re: WC Docket 10-90, Rural Broadband Experiments  
Expression of Interest

### **Entity Background**

Wallowa Valley Networks, LLC is a CLEC and provider of broadband service to Wallowa County, in Northeast Oregon. Our network covers over 300 square miles with fixed-wireless broadband service, with a diverse client base including government and financial institutions and many local businesses. WVN currently offers VoIP telephone service, and if our proposal is funded will meet the FCC requirements for ETC status.

### **Proposal**

We wish to express interest in participating in the experimental program. Our 3-stage proposal provides a solution to several critical telecommunications issues facing rural Wallowa County, Oregon.

### **I - Area Service Redundancy**

Wallowa County has fragile telecommunications infrastructure. The area is served by a single 12-pair fiber-optic trunk that terminates in Enterprise, Wallowa County, OR. The fiber trunk follows a rugged highway route 75 miles to neighboring La Grande, Union County, OR where it connects to backbones paralleling I-84. This line has been damaged several times due to construction and landslides, resulting in County-wide loss of telecommunications for periods greater than 5 hours. This has impact on local health care, public safety, banking, cell providers, businesses, and residents. The line quality is also such that this area has reached the ceiling of what bandwidth the fiber trunk can provide (1Gbps), limiting further growth.

We propose the construction of a second data path from Enterprise, to La Grande, using licensed microwave equipment in the 6Ghz and 11Ghz bands. This new backbone link could initially provide 1Gbps, scalable to 4Gbps with currently available equipment. This will provide service redundancy and double the bandwidth available to Wallowa County.

## **II - Service to Unserved Census Blocks in Eligible Census Tracts:**

**OR063960100**

**OR063960200**

**OR063960300**

This area of Oregon is rugged, and population density is low. Delivery via fiber or cable is unfeasible, and the PSTN copper infrastructure is degrading. As our current deployments have proven, fixed-wireless edge backed by fiber optic core is the solution. This architecture can be deployed rapidly in remote areas and scaled at low cost. Current-generation equipment enables speeds to the user of up to 20Mbps, and provides sufficient quality to enable VoIP, telecommuting, VPN, distance learning and other high-demand uses.

Unreliable power and lack of grid access has led to the use by Wallowa Valley Networks of off-grid solar & propane-powered relay sites to serve certain hard-to-reach areas. WVN requests funding to construct 8 additional off-grid relay sites. These will enable reliable broadband service to a majority of the unserved census blocks.

The construction of the microwave backbone link, discussed in Section I, would include a tower site near the unserved communities of Flora and Troy (pop. 200), and provide fixed-wireless service to the Troy School as well as outlying area residents. A spur microwave link would connect the unserved community of Imnaha (pop. 260) and Imnaha School.

These are areas which lack cell coverage, and where the degrading telephone land lines are subject to failure during wet weather.

## **III - Fiber-Optic Service to Anchor Institutions**

Enterprise, the county seat, currently has a small fiber infrastructure serving Wallowa Memorial Hospital, public safety, local government and Wallowa Valley Networks. It was originally constructed in 2009 for Wallowa Memorial Hospital as part of the FCC Rural Healthcare Pilot Program. WVN will deploy a scalable fiber optic network connecting additional sites, including:

Enterprise City Hall

Enterprise City Library

Northeast Oregon Economic Development District

Wallowa Resources

Natural Resources Conservation Service (NRCS)

Veterans Administration Telehealth Clinic

Enterprise High School & Elementary School

Safe Harbors Shelter

**Closing**

WVN is estimating these projects to require a one-time cost of \$950,000 as well as low yearly subsidies which have not yet been estimated, but which would include the cost of Forest Service tower site leases, frequency licenses, off-grid tower maintenance, and compliance & reporting expenses.

Construction could begin on some project areas immediately after an award is granted, with major tower construction taking place the following summer. Major construction activity could be completed within the following year, and unserved customers would continue to be added as they requested service.

We offer our standard-priced plans across our network coverage area.

1.5Mbps / 512Kbps	\$24.95
4Mbps / 1Mbps	\$34.95
8Mbps / 2Mbps	\$44.95
12Mbps / 3Mbps	\$54.95
16Mbps / 4Mbps	\$69.95

WVN welcomes the opportunity to participate in a program which could go a long way towards bridging the 'digital divide' between rural and urban America. Thanks for your consideration of our proposal, and please feel free to contact us at 888-268-1513 with any questions or requests for more detail.

Sincerely,

Travis Boyd  
Member, Wallowa Valley Networks, LLC