



March 7, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554  
Attn: Wireline Competition Bureau

**Re: WC Docket No. 10-90  
Rural Broadband Experiment Expression of Interest – Rate-of-Return Areas  
Roanoke Telephone Company, Inc.**

Dear Ms. Dortch:

Roanoke Telephone Company, Inc. (Roanoke Telephone) hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to unserved and underserved high-cost areas with additional Connect America funding.<sup>1</sup> Roanoke Telephone is a rate-of-return incumbent local exchange carrier serving rural areas of Alabama.

Currently Roanoke Telephone has Fiber to the Home and DSL facilities providing broadband to its customers. All locations within its regulated service area are capable of being served with speeds greater than 3 Mbps/786 kbps. However, some of the DSL and copper facilities are aging which may cause achieved speeds to degrade and will not support higher speeds. Funds are needed to replace the older DSL and copper that are at the end of life so that Roanoke Telephone can provide higher speeds to meet customer demands. The details of the proposed deployment are as follows.

Proposed Service Area

Roanoke Telephone proposes to upgrade broadband to 180 underserved premises within the regulated service territory on the eastern border of Central Alabama. This includes portions of census tracts 17-9538, 111-3, 111-4, and 111-6.

Proposed Broadband Service

Voice and Broadband services with broadband transmission speeds of greater than 3 Mbps downstream/768 kbps upstream will be provided over the current plant facilities and upgraded network equipment.

Funding

- Roanoke Telephone requests \$250,000 in funding from Connect America Funds in 1 payment.
- Roanoke Telephone expects service to be upgraded at all premises within one year after construction starts.

Roanoke Telephone appreciates the opportunity to provide this non-binding expression of interest. Please contact the undersigned with any questions.

Sincerely,

James Garner  
Vice President of Operations

<sup>1</sup> See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014).