



March 6, 2014

Chairman Thomas Wheeler
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

RE: Expression of Interest for FCC Rural Broadband Experiment funding through the Connect America Fund

Dear Chairman Wheeler:

Harbor Area Regional Board of Resources, Inc. (HARBOR, Inc.) is partnering with Northern Lakes Economic Alliance (NLEA), the Little Traverse Bay Bands of Odawa Indians (LTBB), Char-Em Intermediate School District (ISD), and local governments located within the service area to facilitate the cooperative development of broadband service of 10MB or greater for residents in the HARBOR, Inc. service area that are un-served or underserved.

1) Identity and nature of submitting entities:

HARBOR, Inc. is a 501(c)3 non-profit Michigan corporation with a mission to bring together the Greater Harbor Springs Area Community by providing a platform for cooperation and communication; by encouraging participation through education and discussion, by facilitating the understanding and implementation of plans and proposals; and by promoting, protecting, and maintaining the common vision. HARBOR, Inc. facilitates a regional Broadband Team providing coordination of technology-related projects in the area through a forum for communication among governments, technology service providers and community organizations. This Team worked with the Connect Michigan Community Engagement Program to develop a Community Technology Action Plan, setting community wide goals related to broadband access, adoption and usage in the area.

The local governments included in the HARBOR, Inc. service are: the City of Harbor Springs and the townships of Little Traverse, West Traverse, Pleasantview, Friendship, Readmond, and Cross Village within in the county of Emmet. The HARBOR, Inc. Board of Directors includes a representative from each of the local governments in the service area. Local units of governments with unserved and underserved areas located within their respective jurisdictions may participate in this effort and in some cases have expressed an interest in partnering on technology related projects.

2) Identification of the proposed service area by census block and tract:

The HARBOR, Inc. service area consists of: the City of Harbor Springs and the townships of Little Traverse, West Traverse, Pleasantview, Friendship, Readmond, and Cross Village within Emmet County in rural Northern Michigan. Project activities may be located within and adjacent to the service area, within Emmet County. All areas of the proposed project area fall within the

eligible areas and census tracts according to data provided by the FCC. Please see the attached map of eligible area located within Emmet County. Specifically, we will focus on the eligible tracts of 970100, 970300, 970200, and 970500. Although tract 970400 is not eligible according to the National Broadband Map, we believe that there are anchor institutions within this tract that are underserved.

3) Community Need:

Much of Emmet County continues to suffer chronic deficiency in broadband/Internet availability and service quality issues. It has been difficult to find Internet Service Providers (ISP's) willing to expand adequate Internet service into the northern portion of Emmet County, because it is sparsely populated and isolated at the very tip of the Lower Peninsula of Michigan. As can be confirmed through the National Broadband map, this region lacks Internet access to broadband service of at least 3 Mbps down/768 kbps up.

4) Anchor Institutions:

A number of anchor institutions exist within and adjacent to the service area that is covered by this proposal, including but not limited to:

- Harbor Springs City Hall and 5 township halls
- Harbor Springs School District and associated libraries
- Harbor Springs Library
- Harbor Light Christian Schools and Library
- Crooked Tree Alternative High School
- Emmet County Governmental offices
- Emmet County Sheriff
- Emmet County Road Commission
- Harbor Springs Chamber of Commerce
- LTBB Governmental offices
- LTBB Library
- LTBB Education Classroom (utilized for North Central Michigan College (NCMC) courses)
- LTBB Computer Lab (for public use and for NCMC students)
- LTBB Community Center
- Cross Village Community Center

5) Technology to be Deployed:

In 2010, MERIT Network received \$33.3 million from the National Telecommunications and Information Administration (NTIA) which was used to expand the "middle mile" broadband network capacity in northern Michigan, including Emmet County. Completed in 2013, this network connects rural areas of Michigan to a middle-mile broadband fiber backbone. The next step to provide broadband access in remaining unserved areas is to implement an affordable means to tie into this fiber. With funds provided by the Connect America Fund broadband subsidies, HARBOR Inc. and its partners propose to complete this next step by accomplishing the following:

- (a) Partner with MERIT Network to install middle mile fiber and necessary towers connecting to anchor institutions from their backbone to locations in northern Emmet County (i.e. township halls, schools, libraries, community centers, etc.).
- (b) Solicit proposals from private wireless companies to provide the last mile link from the anchor institutions out into the rural portions of their service area to provide an affordable Internet connection of at least 10 Mbps.

This year, HARBOR, Inc. and project partners will conduct a study of the potential economic impact of an expansion of broadband infrastructure in communities within the HARBOR, Inc. service area that are currently unserved by a broadband speed 10Mbps or higher. The study will examine the scope of economic growth that would be made possible through the increase of low impact, high-tech home-based businesses and tele-working. In addition, an engineering analysis will be completed within and adjacent to the service area. Results from the engineering analysis will be utilized to identify specific project areas and technology to be deployed in these areas along with anticipated costs. Data from the study and engineering analysis will provide the information needed to build-out infrastructure within the service area.

We feel that our plan for bringing Broadband to this rural hard-to-serve area will be successful, as the grant funding will be used to bring the fiber backbone into the rural areas at no cost to either the local units of government, anchor institutions or the ISP's. The costs associated with installation of this fiber are much too high for governments or non-profits to cover and cannot be profitable undertaken by an ISP. Erecting towers connected to the fiber, in strategic locations throughout the region, will also help the wireless providers by eliminating upfront costs, which would take a long time and a large customer base to recover.

We anticipate this plan will be a self-sustaining model offering robust and scalable broadband infrastructure. The wireless providers' access to the MERIT fiber backbone will provide a connection to state of the art technology offering speeds up to 1 Gbps (gigabytes per second) or greater. Over time, as more powerful electronics are made available, the speed and capacity along the fiber network will continue to grow without the need to upgrade the fiber itself. Therefore, as the need for faster Broadband increases over time, the fiber network will be able to keep up with that issue. Through affordable access to strategically placed towers, the wireless providers will have a major impediment solved for them. As wireless technology changes and improves over time, they will be able to upgrade their equipment located on the towers without a large investment on their part.

6) Contemplated Service Offerings:

We anticipate that a minimum of 10 Mbps will be provided as a result of the increased broadband infrastructure as described above; however, the range of speeds may be 10-30 Mbps. It is our intent to provide high quality service at affordable prices ranging from a monthly rate of \$35-100 dependant upon speed.

7) State, local or Tribal governmental participation and/or support for the project (including expedited permitting, access to rights-of-way, matching funds):

The HARBOR, Inc. Regional Broadband Team is comprised of local government officials, Tribal government personnel, small business owners, health care leaders, educational institutions, and industry representatives. This team determined the need for this project and will continue to provide input into project implementation. The personnel time provided through this team will be an in-kind contribution to the project.

The HARBOR, Inc. Board of Directors includes a representative from each of the local governments in the service area. Local units of governments with unserved and underserved areas within their respective jurisdictions may participate in this effort and in some cases have expressed an interest in partnering on technology related projects.

Northern Lakes Economic Alliance (NLEA) staff will provide technical assistance to this project. NLEA is a private non-profit corporation serving Antrim, Charlevoix, Cheboygan and Emmet Counties. NLEA's mission is to retain and create jobs. NLEA has provided business and community development services for 30 years and is governed by a 25-member Board of Directors appointed by the four member counties.

Charlevoix-Emmet Intermediate School District (Char-Em ISD) serves Charlevoix and Emmet Counties, providing services to students within our jurisdiction. The ISD provides Special Education, Vocational Training and General Education services to the 11 districts within its boundaries. Harbor Springs and Pellston students reside in the Northern Emmet county region and would be greatly served within this project. Charlevoix-Emmet ISD also provides technical services to the Pellston School district, and would be able to partner in a greater capacity with the students we serve inside this project.

The Little Traverse Bay Bands of Odawa Indians (LTBB) will support this project. LTBB is willing to provide access to land for tower locations as determined necessary by the engineering analysis. Exact locations of towers will require final approval of the Tribe's legislative body. LTBB will also provide in-kind contributions of staff time to support this project, including consultation and services from the following personnel: Planning Director, Grant Writer, Geographic Information Systems Director (interactive maps), and Management Information Systems Director.

8) Nature and estimate of funding requested:

This request will include a combination of one-time capital support. It is anticipated that a one-time capital support request of \$5-7 million is necessary to provide adequate services within the service area; however, actual requested funding is dependant upon the results of an engineering and associated cost analysis.

If you should have any questions regarding this expression of interest, please contact me at 231-526-5060 or rachel@harborinc.org.

Respectfully submitted,



Rachel R. Smolinski
Executive Director