



Spiral Communications LLC
602 S Locust Street
Glenwood, IA 51534



Farmers Mutual Telephone Company

410 Broad Ave.
Stanton, IA 51573



Southwest Telephone Exchange
404 Howland St
Emerson, IA 51533



Chat Mobility
404 Howland St
Emerson, IA 51533

March 3, 2014

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

RE: Connect America Fund, WC Docket 10-90: Technology Transitions

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for Spiral Communications LLC ("Spiral"), Farmers Mutual Telephone Company ("FMTC"), Southwest Telephone Exchange ("STE"), and Chat Mobility ("Chat") regarding the Connect America Phase II network experiments. We appreciate the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

Craig Hagenau
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Non-Binding Expression of Interest-Phase II Rural Broadband Experiment

Spiral Communications LLC (“Spiral”), Farmers Mutual Telephone Company (“FMTC”), Southwest Telephone Exchange (“STE”), and Chat Mobility (“Chat”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is Stage 1 of the FCC’s Phase II experiment proposals and Spiral Communications LLC (“Spiral”), Farmers Mutual Telephone Company (“FMTC”), Southwest Telephone Exchange (“STE”), and Chat Mobility (“Chat”) anxiously awaits release of the Stage 2 formal proposal requirements.

Background

Spiral Communications LLC is a multi-service corporation providing communications products and services in Rural SW Iowa to 950 customers in 7 communities and encompassing 4 counties in SW Iowa. Spiral provides an array of telecommunications products and services, including Local Telephone Service (VoIP) in partnership with Alliance Connect, High Speed Internet (both fiber to the home communities and fixed wireless deployments), Security Cameras, Wireless Networks, and Business and School District Solutions.

Farmers Mutual Telephone Company (FMTC) is an independent telephone company with its principal business location in Stanton, Iowa. FMTC serves five (5) telephone exchanges in Iowa as an Incumbent Local Exchange Carrier (ILEC) - Stanton, Bethesda, New Market, Villisca and Nodaway. FMTC is approximately 113 years old. FMTC received their license to provide telecommunications service from the Iowa Utilities Board (IUB) in 1901. FMTC offers voice, data, video and associated telecommunications services within all of their exchanges.

Southwest Telephone Exchange (DBA is Interstate Communications) is a family owned business, acquired in 1978 from private owner. STE has three exchanges, Emerson, Imogene and Henderson with a total of 455 voice subscribers and 323 broadband customers.

- 47% of homes passed have broadband
- 71% of voice subscribers have broadband
- Homes passed by fiber route is 682
- 162 IP video customers
- Completed FTTH in town and rural end of 2012
- 173 route miles of fiber (not including drops to homes and businesses)
- Iowa Network Services stockholder
- STE is the Administrator of SWIN (Southwest Iowa Network). SWIN is a fiber OC-48 SONET and 10G data network covering over 300 miles in Southwest Iowa and comprised of nine Telecom companies.
- Smart farm- demo can remotely control and monitor (thru broadband connections and use of smart phone, tablet, PC) temperature, level of grain in bins, door locks, video cameras of buildings and feed lots, motion sensors. Farm was featured on RFD TV which aired on Thursday, February 6th at 8:00 pm EST on The Machinery Show,

produced by Successful Farmer and the Meredith Corp. Here is the YouTube link:
<http://www.youtube.com/watch?v=ryzhaiBoB4g>

Headquartered in Emerson, IA., Chat Mobility, a company majority owned by local independent telephone companies, is a provider of wireless services to over 15,000 rural customers in southwest and south central Iowa for over nineteen-years. Chat Mobility provides its customers with innovative technology including 4G data and mobile services, the latest wireless equipment and nationwide coverage. For more information about Chat Mobility and its products and services, visit www.chatmobility.com or call 800-944-5526.

Our four companies have been working on projects together on a smaller scale and we all share the same common goal which is to improve telecommunications and broadband in SW Iowa. With our networks combined, we are able to bring FTTH networks, Fixed Wireless networks, and Mobile Wireless networks together to better serve our communities in SW Iowa. Spiral has extensive experience in providing fixed wireless networks to rural communities in SW Iowa. Partnering with Chat Mobility to utilize their towers will allow our group to service more communities in a quicker timeframe. Each of our companies has fiber in the ground and with that fiber footprint deployment to many underserved areas would be quick and efficient.

Our model will be a hybrid approach bringing fixed wireless broadband to the area with our towers and providing service to those areas that are expensive to run fiber to or are out in the country by themselves. We will also be able to provide broadband in the city proper and business districts (including the anchor institutions) with our extensive fiber network. Utilizing Chat's mobile wireless networks will allow us to offer unified communications throughout all of our coverage areas.

Proposed Service Area

The proposed service area covers the following census tract numbers:

County	Census Tract Number	Census Tract Locations	Locations Eligible for High Cost
Fremont	190719701	1001	318
Fremont	190719702	1215	261
Fremont	190719703	1215	587
Page	191454901	1157	312
Page	191454904	1080	22
Page	191454905	1161	5
Page	191454906	1118	141

Adams	190039501	855	125
Adams	190039502	1155	2
Mills	191290401	1368	517
Mills	19129040201	948	498
Mills	19129040202	1368	432
Mills	19129040302	1309	3
Montgomery	191379601	983	355
Montgomery	191379603	1748	4
Montgomery	191379604	1334	282
Taylor	191731801	311	166
Taylor	191731802	375	84
Taylor	191731803	401	241
Pottawattamie	191550214	1478	617
Pottawattamie	19155021501	977	256
Pottawattamie	19155021502	1369	47
Pottawattamie	19155021602	1017	562
Pottawattamie	19155021603	977	595
Pottawattamie	19155021701	1039	114
Pottawattamie	19155021702	955	296
Pottawattamie	19155030402	1499	3

Pottawattamie	19155031300	1377	18
Pottawattamie	19155031601	990	10
Pottawattamie	19155031700	1681	100
Pottawattamie	19155031800	1354	161
Pottawattamie	19155031900	1578	136

Included in our census tracts there are a total of 33 School Districts, 27 Libraries, and 19 Hospitals and Clinics. Our initial research of these tracts shows that the majority of the School Districts, Libraries, and Hospitals and Clinics are struggling with their current bandwidth and are very anxious for someone to come to town with a better solution. Our current market coverage has our group in all of these areas already to some extent. With our group forming a partnership we can combine our assets in these areas along with some FCC assistance to bring a solution to these areas quickly and cost efficiently.

Broadband Technology

Spiral Communications LLC (“Spiral”), Farmers Mutual Telephone Company (“FMTC”), Southwest Telephone Exchange (“STE”), and Chat Mobility (“Chat”) anticipate using a hybrid approach for this proposed project area in order to build a high-speed, robust, scalable broadband network. We intend on using a combination of fixed wireless, mobile wireless, and a FTTH/FTTB approach in each of these tracts to provide as much bandwidth to these areas quickly and in a cost effective manner. Part of our plan is to research these areas after we submit our letter of interest to the FCC and gather that information.

Service Offerings

The service offerings anticipated by Spiral Communications LLC (“Spiral”), Farmers Mutual Telephone Company (“FMTC”), Southwest Telephone Exchange (“STE”), and Chat Mobility (“Chat”) are voice service, high-speed broadband service, and possibly video service. With our deployment in the census tracts we hope to be awarded, we will be able to deliver upload and download speeds far exceeding the minimum requirements of the FCC. Our system will allow for whatever bandwidth requirements that are requested. Spiral is currently working in Nebraska City on a FTTH deployment that will provide businesses and residents speeds up to 1 Gb. The **minimum** speed tier expected to be available to all homes and businesses passed including Community Anchor Institutions within the proposed project area, is 10 Mb download speed and 5 Mb upload speed. IPTV is the nature of the video service and will only be available in the FTTH build outs in our census tracts. We can not provide you with an estimated timeline as we are not sure of the tracts we will be awarded. When replying to the RFP once it is released we will know more of which tracts we will go after and be able to provide a definitive timeline. With our response in this letter, we included all the census tracts that we would be interested in.

Funding

Spiral Communications LLC (“Spiral”), Farmers Mutual Telephone Company (“FMTC”), Southwest Telephone Exchange (“STE”), and Chat Mobility (“Chat”) are unable to estimate the cost of these projects without further engineering studies into these census tracts. We would estimate that we would request continuing funding support for 7 years for each of the projects we will be working on.

Conclusion

Spiral Communications LLC (“Spiral”), Farmers Mutual Telephone Company (“FMTC”), Southwest Telephone Exchange (“STE”), and Chat Mobility (“Chat”) are very excited to team together to form a stronger team to be able to provide increased broadband to the census tracts in our response. We feel that by combining our experience and assets that we can really make a difference in rural SW Iowa. The communities that we are interested in have been underserved and over promised results for decades and we feel our team is equipped to address this lack of broadband service. These communities are dying and continue to lose population and the opportunity to attract new businesses and keep their existing business and residents because they lack acceptable broadband services. By investing in these communities, they will be given the opportunity to attract and keep businesses in their communities.

Spiral Communications LLC (“Spiral”), Farmers Mutual Telephone Company (“FMTC”), Southwest Telephone Exchange (“STE”), and Chat Mobility (“Chat”) have a strong track record of success in our markets and we feel with our new partnership and the assistance of the FCC that we truly can make a difference.