



03/07/2014

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

Re: Connect America Fund, WC Docket No. 10-90: Next-Generation Network Experiments in Rural America, Order Released January 31, 2014; Expression of Interest Letter

Dear Commissioners:

The City of Wilson hereby expresses interest in providing Gigabit, fiber-to-the-home services to rural high cost and extremely high cost areas in Wilson County by utilizing the FCC Next-Generation Network Experiments in Rural America program, and responds to the Commission's questions as follows:

Nature of Submitting Entity

The City of Wilson has been operating a community-wide, fiber-to-the-home network under the name of Greenlight Community Broadband since 2008, and is North Carolina's only residential Gigabit fiber-to-the-home service provider. The City is also a municipal electric utility serving a six-county area.¹

Proposed Service Area

The City proposes to utilize the FCC's Next Generation Network Experiments in Rural America program to deploy voice, video and Gigabit internet, fiber-to-the-home services to the 35 eligible census blocks that the FCC has determined are unserved, high-cost, and extremely high-cost, rural areas in Wilson County. These blocks are identified by the FCC in WC Docket 10-90, Public Notice DA-2414.² (Table 1, Figure 1) Based on existing electric service account data, there are 136 serviceable locations in the proposed project area. Of the 136 serviceable locations, 20 locations are commercial sites, and the remaining 116 blocks are residential locations. There are no anchor institutions located in these census blocks.

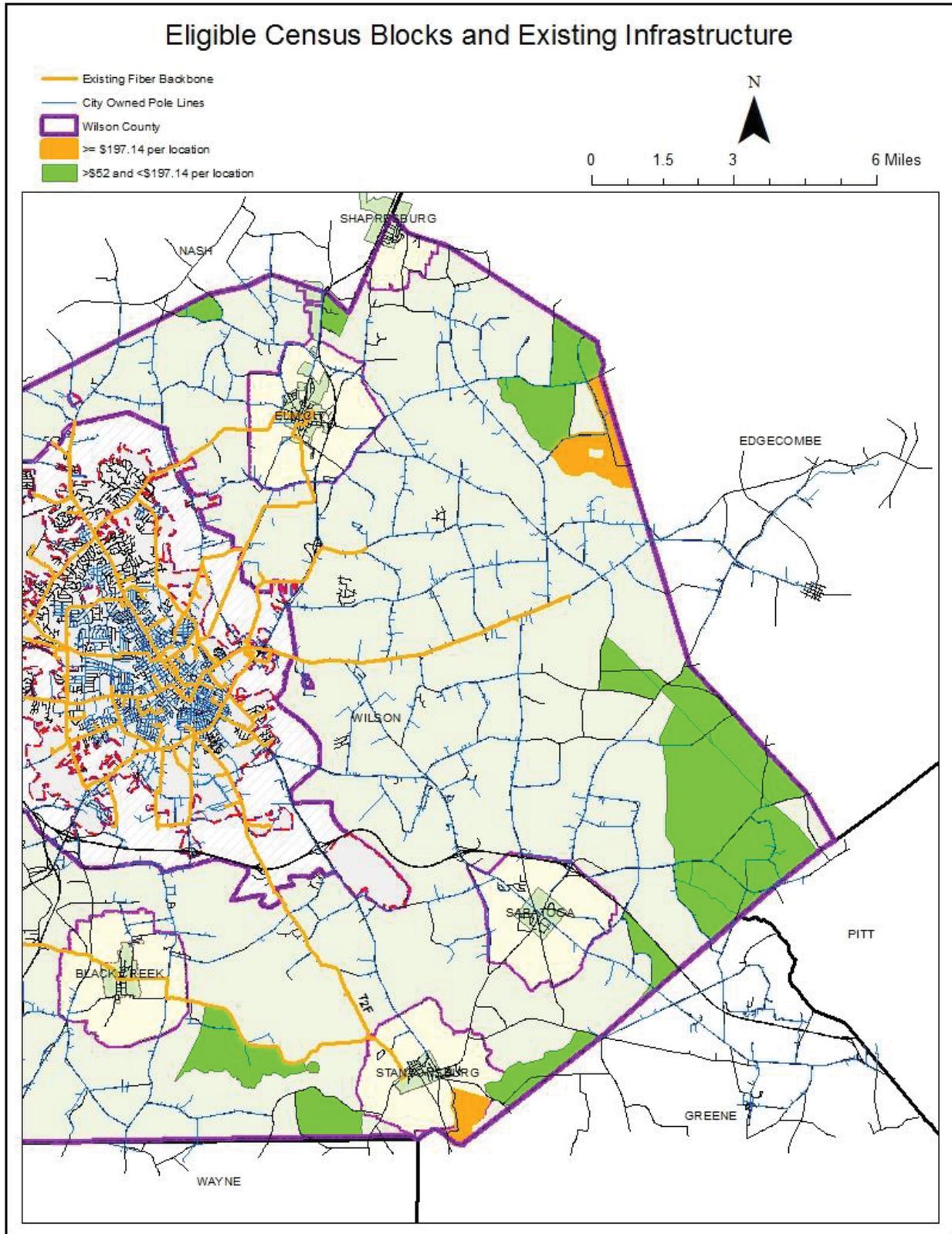
¹ Under North Carolina's State Law 2011-84. "Level Playing Field/Local Gvt Competition - An Act to Create Jobs," the City is currently limited to providing broadband services to only the Wilson County limits.

² These Census Blocks are drawn from version 4.0 of the FCC's high cost model, WC Docket 10-90, Public Notice DA 13-2414. For Wilson County, the same census blocks are identified in both the \$48 and \$52 funding levels.

Table 1: Eligible Blocks

State	County	Tract	Block		State	County	Tract	Block
37	195	001300	1031		37	195	001300	4000
37	195	001100	1018		37	195	001100	1020
37	195	001100	1012		37	195	001100	1006
37	195	001100	2029		37	195	001100	1010
37	195	001200	3011		37	195	001100	1000
37	195	001000	1021		37	195	001300	1033
37	195	000900	3004		37	195	001100	2032
37	195	001200	3012		37	195	001100	1008
37	195	001100	1011		37	195	001100	1001
37	195	001100	1017		37	195	001100	1015
37	195	001100	1016		37	195	001100	2021
37	195	001100	1005		37	195	001200	3020
37	195	001100	1022		37	195	001100	1045
37	195	001300	1030		37	195	000900	3003
37	195	001300	4009		37	195	001300	1039
37	195	001100	1002		37	195	001300	1037
37	195	001100	1004		37	195	001000	1075
37	195	001100	1007					

Figure 1: Map of Eligible Blocks



Broadband Technologies

Greenlight Community Broadband provides services via an all-fiber network that utilizes a local convergence architecture. Voice, video, and data services are delivered via Gigabit Passive Optical Network (GPON). Greenlight also delivers active dedicated internet and metro-Ethernet services for large entities and community anchor institutions as needed based on service requirements.

Service Offerings

Greenlight proposes to provide a variety of voice, video, and data services in the project areas at the following price points, which replicate those services currently offered in the City of Wilson. (Tables 2, 3, 4)

Table 2: Voice Packages

Package	Monthly
Home Phone Plus	\$34.95
Basic Phone	\$24.95

Table 3: Video Packages

Package	Monthly Price	Channels
Expanded Basic	\$49.95	Expanded Basic
Digital Lineup	\$61.95	All channels from Expanded Basic, plus: Digital Plus , Digital Broadcast , High Definition Basic * Requires HD set top box for HD programming
Bronze	\$74.95	All channels from Digital Lineup, plus: 1 Premium channel
Silver	\$84.95	All channels from Digital, plus: 2 Premium channels
Gold	\$99.95	All channels from Digital, plus: 4 Premium channels

Table 4: Data Packages

Package	Download	Upload	Monthly
20Mbps Tier	20 Mbps	20 Mbps	\$34.95
40Mbps Tier	40 Mbps	40 Mbps	\$54.95
60Mbps Tier	60 Mbps	60 Mbps	\$74.95
100Mbps Tier	100 Mbps	100 Mbps	\$99.95
1Gbps Tier	1Gbps	1Gbps	\$149.95

Funding & Expected Local Participation & Support for the Project

The City of Wilson is the owner of its Greenlight Gigabit fiber network. It would request one-time support to build out to these rural high-cost and extremely high-cost areas, but would participate in and support the project by operating the system on its own resources. This project does not require continuing support beyond initial construction and installation operations.

Item	Budget Amount
Installation	\$136,000
Remote Serving Facilities	\$410,000
Feeder Construction	\$966,073
Distribution Construction	\$813,908
Total Project Cost	\$2,325,981

Other Comments

While we have limited our expression of interest service area to only Wilson County because we are limited to that area under current state law, the City could very easily serve a much larger expanse of unserved rural areas with our Gigabit capacity. For example, our utility service area expands into five other neighboring rural counties (some characterized as the poorest in the state) where we own the poles or have joint-use agreements. Additionally, we have limited our above budgeting to those census blocks the FCC has preliminarily characterized as eligible high-cost and extremely high-cost in price cap areas, and areas not currently served with 3Mbps/768K service or by an unsubsidized carrier. However, we note for the Commission that in our assessment, there are a much larger number of census blocks that should be found eligible, because according to anecdotal evidence from some residents, they are not served with adequate broadband access, despite being reported as served by the FCC’s maps.

We are available for further questions or details, and we appreciate the Commission’s interest in ensuring that the rural areas of our country are not relegated to digital “have-not” status.

Sincerely,



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