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March 7, 2014

Ms. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
455 12<sup>th</sup> Street SW  
Washington, DC 20554

**Subject:** Letter of Intent - FCC Rural Broadband Experiments

Dear Ms. Dortch:

Advanced Communications Technology, Inc. (ACT) is very interested in the FCC rural broadband experiments. ACT serves as a Competitive Access Provider (CAP) in Montana and Wyoming, and as a Competitive Local Exchange Carrier (CLEC) in several Wyoming communities. ACT has been providing communications services in these areas since its inception in 1997.

Although the areas ACT serves are sparsely populated, it has been able to provide broadband communications services in rural communities equal to those available in more densely populated areas. ACT is actively expanding its optical fiber broadband network to provide higher broadband speeds and advanced services to remote areas across Wyoming. As an integrated part of the communities it serves, ACT understands the positive impact that broadband communications has on economic development, health care services and higher education (just to name a few). ACT also understands the challenges in providing broadband communications services in remote and sparsely populated areas.

**Proposed Service Area**

ACT proposes to extend high speed broadband from its existing fiber network into currently unserved and underserved areas in southern Sheridan County and all of Johnson County, Wyoming (see specific census tract reference at the end of this letter). These remote areas are currently economically disadvantaged and in need of the broadband services that would be made available under the ACT proposal.

To facilitate the extension of its existing broadband network, ACT plans to partner with federal, state and local agencies to secure the necessary permitting for fiber construction and wireless infrastructure placement. ACT would also partner with current and future wireless and wireline broadband access providers operating within this area to assure adequate access to backhaul infrastructure and competitive pricing to end users.

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**Critical Community Facilities**

The proposed broadband network will serve the following critical community facilities:

- While ACT has already constructed fiber facilities to the Johnson County Health Care Center, the Johnson County Justice Center, City Hall, the Johnson County Fire Hall, and numerous other critical community facilities, we would plan to extend broadband infrastructure to additional facilities such as:
  - Big Horn Fire Station
  - Story Fire Station
  - Veterans Home of Wyoming, Buffalo
  - Other critical sites as identified

The area targeted also includes numerous small business entities that would benefit from higher speed broadband communications services.

Based upon the census data, the proposed area includes 1,378 high cost or extremely high cost locations.

**Proposed Broadband Service Offerings**

ACT offers a wide selection of broadband communications services including TDM and IP voice services, high speed Internet and access to video streaming services. These are available in various combinations with broadband speed offerings in multiple tiers ranging from minimal 3Mbps to 100Mbps (where supported). All services available through ACT would be offered throughout broadband experiment area. Following is a list of the standard ACT broadband options and pricing:

<b>Download/Upload</b>	<b>Price</b>
3 Mbps/1.5 Mbps	\$25.00
6 Mbps/1.5 Mbps	\$30.00
10 Mbps/3 Mbps	\$35.00
15Mbps/ 5 Mbps	\$55.00
20Mbps/ 5 Mbps	\$65.00
30 Mbps/ 5 Mbps	\$80.00
50 Mbps/ 5 Mbps	\$140.00
50 Mbps/20 Mbps	\$280.00
60 Mbps/20 Mbps	\$305.00
70 Mbps/20 Mbps	\$330.00
80 Mbps/20 Mbps	\$355.00
90 Mbps/20 Mbps	\$380.00
100 Mbps/20 Mbps	\$405.00

**Proposed Technologies**

ACT proposes to utilize Fiber To the Premise (FTTP) using Passive Optical Network (PON) and Active Ethernet (AE) for those last mile deployments that are adjacent to its

Ms. Marlene Dortch  
March 6, 2014  
Page 3

existing fiber optic middle mile routes and 3.65GHz registered radio spectrum to deploy LTE and WiMAX broadband fixed wireless services to reach isolated subscribers beyond the economical reach of its optical fiber facilities.

### **Local Support**

ACT has received numerous requests from citizens and community leaders in the targeted project area to bring high speed broadband to rural inhabitants and businesses. As the proposed networks would be deployed, ACT will hold community meetings to introduce the expanded broadband services to residences and businesses in the targeted area, as well as provide broadband connectivity and computer resources for adult education, free Internet training classes, and other programs encouraging use of the deployed technologies.

### **Team**

ACT plans to team up with the Wyoming Department of Transportation and other federal, and local agencies to facilitate the permitting and right-of-way easement process, and to investigate opportunities to partner with the local power companies for remote monitoring of power systems and usage. Existing ISP's operating in these areas would also be approached to determine wireline and wireless backhaul needs during construction.

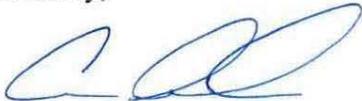
### **Project Timeline and Cost**

The project timeline is directly related to FCC funding availability. Our goal is to begin installation and construction activities no later than the second quarter of 2015.

A high-level estimate of funds required to build out the network would be \$7,441,200 and ACT would plan to contribute \$1,860,300. It would be our preference to utilize one-time funding from the FCC for the balance of \$5,580,900 rather than continuing funding.

ACT has the capacity, experience, and capabilities to provide high speed broadband services in southern Sheridan County and throughout Johnson County, Wyoming and appreciates the opportunity provided under this program.

Sincerely,



Aaron Sopko  
General Manager

### **Project Area Census Tracts/Blocks**

- Sheridan County, WY – Census Tract 56033000500 (Price cap territory)
- Johnson County, WY - Census Tracts 5601995/5100 & 55200 (Price cap territory)