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TO: Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

FROM: Mark Feest, CEO/General Manager
CC Communications

RE: Expression of Interest – Rural Experiment WC Docket 10-90

DATE: March 7, 2014

Background

Churchill County Telephone came into existence in 1889 when the local telegraph company sought to exit the business after the decline of silver mining in rural Northern Nevada. The Churchill County Commission felt that telegraph service was important to the region, and thus, purchased the telegraph facilities for nine hundred dollars. Soon after the plant began its conversion to a telephone system, and one hundred years later began to upgrade facilities to offer DSL soon followed by IPTV. Today, doing business as CC Communications, the company continues to be owned by Churchill County, NV, and offers service throughout the County's boundaries.

CC Communications prides itself on being an asset to the community. Planned construction projects for FY 14-15 will bring our FTTH deployment to approximately 85% of the homes and businesses in Churchill County. Due to our efforts to deploy broadband throughout our service area, Churchill County was recently recognized as the second broadband community by Connect Nevada.

CC Communications is frequently contacted by neighboring communities that lack broadband service, inquiring whether we are able to serve other areas with broadband. We have attempted to build business cases for neighboring communities, however, without USF funding those areas cannot be served. It is with this background that we are interested in exploring the opportunity to serve these communities with help from the Rural Trials Docket 10-90.

Geographic Territory

CC Communications has previously explored offering broadband service in Pershing County Nevada (32027) TractID 32027960100 and determined that the project is only possible if some type of grant funding were available. CC Communications is now constructing business plans for other tracts listed in the Eligible Location document and at such time as the FCC issues rules, CC Communications may be prepared to submit proposals for tracts within Pershing County, Lyon County, Esmeralda County, Nye County, Storey County or Washoe County.

List of Anchor Institutions

There are several anchor institutions with the proposed area including schools, libraries, hospitals, clinics, tribal government, law enforcement and city and county governments. In previous discussions with many of these anchor institutions it has been expressed to CC Communications that a need exists for higher bandwidth services. It would be the intent of CC Communications to provide services to anchor institutions throughout the proposed area.

Proposed Technology

CC Communications would consider both a complete build out of wireless technologies, as well as a mix of FTTH and wireless technologies. With respect to the wireless build out, CC Communications would deploy fiber optic fed WiMax technology. We believe that the area would be best served by FTTH, and thus, dependent upon available funds, we would seek to serve the less rural portion of the area with FTTH.

Existing Providers

AT&T

Scalability

CC Communications would leverage its existing fiber and radio backhaul facilities in rural Northern Nevada, as well as existing switching equipment together. CC Communications has existing staff and relationships with contractors to employ a phase approach to deployment and future growth.

Investment

Investment required for a fiber fed WiMax deployment in TractID 32027960100 would be approximately \$2,905,000.