



**DATE:** March 7, 2014  
**TO:** Federal Communications Commission  
**FROM:** LocalTel Communications; John Seabeck, Vice President  
**SUBJECT:** Expression of Interest / Rural Broadband Experiment; WC Docket 10-90

### **Background**

LocalTel Communications (LocalTel), a facilities-based competitive local exchange carrier (CLEC) and wireless ISP (WISP) operating under the brand SkyFi wireless Internet, utilizes fixed wireless and wireline technology to provide broadband and voice service to rural customers in North Central Washington. LocalTel hereby files this expression of interest in the Commission's Rural Broadband Experiment (Experiment) under WC Docket 10-90.

Because LocalTel has successfully deployed fixed wireless last mile solutions to many unserved and underserved rural areas in North Central Washington the company's participation in the program will provide the Commission valuable data concerning the geographic and demographic characteristics of serving rural areas using wireless services comparably priced to urban wireline offerings. In addition, the company's experience delivering fiber-based wireline broadband service will also serve to inform the Commission of the comparative costs and benefits associated with delivering broadband and voice services over both wireline and wireless facilities.

As an established competitive (non-incumbent) service provider in these markets LocalTel's participation in the Experiment will assist the Commission with evaluation of the feasibility of directing CAF support to non-incumbent service providers in rural, unserved areas. To that end, the company is already in the process of obtaining ETC designation in Washington.

### **Proposed Technology**

LocalTel will deploy a fixed wireless network utilizing unlicensed spectrum in the 900 MHz, 5 GHz and 24 GHz bands. Deployment of this fixed wireless network will permit the company to provision high-speed, scalable, IP-based wireless broadband Internet access services to residences and businesses in these unserved rural areas. Utilizing sectorized and omnidirectional AP antennas and transmission equipment manufactured by Ubiquiti Networks, the company's fixed wireless network can be deployed in both heavily wooded areas and clear line-of-sight areas using the different unlicensed spectrum frequencies described above. LocalTel will deploy its



fixed wireless antenna and associated equipment on available towers and related fixed structures, which will be powered by an AC 2-20 power source, or by DC solar/wind power where AC power is not available.

LocalTel's proposed fixed wireless network deployment will help inform the Commission of the feasibility (with appropriate support) of using fixed wireless technology, over unlicensed spectrum, to deliver last mile broadband solutions to rural areas.

### **Proposed Services**

LocalTel will provide both broadband Internet access service and voice telephony service over its fixed wireless network. The company currently offers several tiers of broadband Internet access service to residential customers, including the following speed-based service tiers: 10Mbps (up) / 2 Mbps (down); 15 Mbps / 2 Mbps; 20 Mbps / 2 Mbps; 30 Mbps / 2 Mbps. The company also offers broadband Internet access service to business customers at even higher speeds. The company offers voice telephony services to both residential and business customers on an unlimited and metered basis. In addition, the company anticipates that it will provide remote video monitoring and IP video services to its customers.

### **Geographic Territory**

LocalTel will provide service to unserved rural areas in North Central Washington state to approximately 6000 households in the counties of Chelan, Douglas and Grant. Covering approximately ninety (90) square miles of the Cascade Mountain range, the targeted area includes a multitude of valleys, hills, meandering rivers and lakes. The balance of the area is flat lands, spread out rural towns, and farms. As is evident from this description, this area has lots of remote pockets of homes spread out in varying distances away from small communities. Based upon informal site surveys and our long-term experience in these markets LocalTel believes that the number of unserved households in these areas is higher than the number of unserved locations identified on the Bureau's preliminary list of potentially eligible census tracts released on February 6<sup>th</sup>. Specifically, the number of unserved households in the three counties identified herein likely exceeds 15,000 households.

### **Community Anchor Institutions**

There are numerous Community Anchor Institutions (CAI) in the areas identified by LocalTel, including public and private schools such as Stehekin Elementary, Winton Elementary, Holden Village Community School, and Mansfield Elementary and High School, Marlin Hutterite Private School, George Elementary School, Wilson Creek Elementary and High School and Beaver Valley School. In addition, LocalTel's proposed project would be positioned to extend broadband Internet access, voice telephony, remote video monitoring and IP video services to important public service agencies such as ranger stations, forest service buildings, county and state park administrative offices, and state transportation and public works agencies.



### **State and/or Local Tribal Government Participation**

LocalTel expects to work closely with several local and Tribal governments to obtain support to deploy fixed wireless network facilities in their jurisdictions. LocalTel is actively engaged with representatives from these local and Tribal governments to obtain their support.

### **Existing Providers**

LocalTel is not aware of any unsubsidized competitive provider offering broadband service in these areas.

### **Project Timeline**

The projected work schedule for this program would begin November, 2014 and would be completed by October, 2017.

### **Total Service Provider Investment**

LocalTel anticipates investing between \$400,000 to \$600,000 in this project.

### **Funding Request**

LocalTel expects to seek recurring funding of between \$2-3 million annually.

### **Total Project Cost**

The projected total cost of the project is between \$6-8 million.