



VIA ECFS

March 7, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554
Attn: Wireline Competition Bureau

**Re: WC Docket No. 10-90
Rural Broadband Experiment Expression of Interest – Rate-of-Return Areas
Egyptian Telephone Cooperative Association**

Dear Ms. Dortch:

Egyptian Telephone Cooperative Association (Egyptian Telephone) hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to unserved and underserved high-cost areas with additional Connect America funding.¹ Egyptian Telephone is a rate-of-return incumbent local exchange carrier serving rural areas of Illinois.

Currently Egyptian Telephone has Fiber to the Home and DSL facilities providing broadband to its customers. All locations within its regulated service area at speeds of at least 3 Mbps/786 kbps. However, some of the DSL and copper facilities are aging which may cause achieved speeds to degrade and will not support higher speeds. Funds are needed to replace the older DSL and copper that are at the end of life so that Egyptian Telephone can provide higher speeds, meet customer demands, and transition to an all-IP network for the 2000 locations. The details of the proposed deployment are as follows.

Proposed Service Area

Egyptian Telephone proposes to upgrade broadband to 2000 underserved premises within the regulated service territory in Randolph, Jackson, Washington, St. Clair and Perry Counties in Illinois.

Proposed Broadband Service

¹ See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014).

Voice and Broadband services with broadband transmission speeds of 500 Mbps downstream/50 Mbps upstream provided over the Fiber to the Home plant funded by this request.

Funding

Egyptian Telephone estimates construction costs for this project to be \$12M. However, the FCC has not yet determined the qualifications for the funding in the ROR areas nor how a onetime capital expenditure relates to annual support. Once the qualification for funding are determined, Egyptian will be in a position to request a specific funding amount.

Egyptian Telephone expects service to be upgraded at all premises within two years after construction starts.

Egyptian Telephone appreciates the opportunity to provide this non-binding expression of interest. Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Jacobsen', with a long horizontal flourish extending to the right.

Kevin J. Jacobsen
CEO
Egyptian Telephone Cooperative Association