

General Offices

Cellular Network Partnership, L.P.

108 East Roberts Avenue

Post Office Box 539

Kingfisher, Oklahoma 73750

405-375-4111

March 7, 2014

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

RE: Expression of Interest – Rural Broadband Experiments
Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

Cellular Network Partnership, L.P. (CNP) submits this letter of interest for the Connect America Funds to provide services in high cost and extreme high cost locations.

A. Entity Background

Cellular Network Partnership, L.P. was formed in 1988 and is an Oklahoma Limited Liability Partnership. CNP, d/b/a Pioneer Cellular is a leader in rural wireless communications serving forty (40) counties in Oklahoma and fourteen (14) counties in southern Kansas. Pioneer Cellular provides ubiquitous 3G service throughout its service territory using 357 tower sites and has begun to provide LTE 4G service in many of its higher populated areas. Pioneer Cellular provides nationwide coverage through roaming alliances with national carriers as well as advance mobility services and data applications such as video, picture, text messaging and high-speed web browsing. For more information about Pioneer Cellular, please visit our website, www.ptci.com.

Pioneer Cellular's majority owner is Pioneer Telephone Cooperative, Inc., a local exchange carrier, which serves seventy-six (76) exchanges in western Oklahoma. Pioneer has been in business for over sixty (60) years and provides an array of telecommunications products

and services, including telephone service, High-Speed Internet, Digital TV, Long Distance, Wireless Broadband, Security Systems, Business Solutions and Yellow Pages Advertisement.

B. Geographic Territories

Pioneer Cellular has reviewed the Phase II Connect America Fund tracts for price cap carriers. Pioneer Cellular has found several tracts of interest in which coverage can be improved to meet FCC minimum eligible speed and service requirements.

The areas of interest are divided into the nine distinct communities. The communities overlap into nine counties. The table below provides the basic information for geographic territories. The detailed demographic information has been obtained but omitted for the letters brevity.

Community	State	County Name	TractID	Eligible Locations	Annual Support	Average Support per Sub	Sq. Mi.	HH	Pop
Alva	OK	Woods	40151954200	319	\$100,557	\$ 315	823	2165	4175
Alva	OK	Woods	40151954300	16	\$5,121	\$ 320	8	1240	2942
Cherokee	OK	Alfalfa	40003955600	34	\$15,863	\$ 467	437	1021	1469
Cherokee	OK	Alfalfa	40003955700	102	\$37,867	\$ 371	115	712	1338
Cherokee	OK	Alfalfa	40003956000	21	\$6,402	\$ 305	329	1030	2835
Clinton	OK	Custer	40039950800	79	\$22,630	\$ 286	47	1579	3916
Clinton	OK	Custer	40039960400	272	\$100,051	\$ 368	186	3095	7209
Elk City	OK	Beckham	40009966100	98	\$36,679	\$ 374	42	3408	7400
Elk City	OK	Beckham	40009966200	531	\$199,943	\$ 377	143	3104	6970
Elk City	OK	Beckham	40009966500	78	\$30,262	\$ 388	378	976	1756
Elk City	OK	Beckham	40009966800	250	\$116,040	\$ 464	341	2159	5993
Fairview	OK	Major	40093955200	357	\$128,532	\$ 360	583	845	1584
Fairview	OK	Major	40093955300	100	\$59,748	\$ 597	52	1418	2792
Hitchcock	OK	Blaine	40011958800	93	\$13,100	\$ 141	416	658	1220
Medford	OK	Grant	40053956500	111	\$20,888	\$ 188	735	1685	3052
Weatherford	OK	Custer	40039960600	130	\$69,079	\$ 531	92	2311	5377
Weatherford	OK	Custer	40039960700	54	\$20,727	\$ 384	59	3425	7611
Weatherford	OK	Custer	40039961000	328	\$96,326	\$ 294	619	1794	3356
Woodward	OK	Harper	40059952100	27	\$1,316	\$ 49	589	905	1718
Woodward	OK	Woodward	40153953100	9	\$1,569	\$ 174	547	1010	2107
Woodward	OK	Woodward	40153953200	603	\$251,128	\$ 416	660	1636	4712
Woodward	OK	Woodward	40153953300	33	\$15,345	\$ 465	14	1880	4118
Woodward	OK	Woodward	40153953400	47	\$21,581	\$ 459	11	1614	3568
Woodward	OK	Woodward	40153953500	48	\$11,177	\$ 233	14	2698	5576

C. Broadband Technology

Pioneer Cellular is currently rolling out 4G LTE mobile service to density high demand area using 3GPP Rel. 9 OFDMA technology. The technology can also be used to support fixed wireless broadband service using the 1900 MHz bands.

In review of the tracts for areas needing service, Pioneer Cellular could not support a fixed customer base in low density areas without the financial support from the CAF. The fixed network user requires a voice QOS and large data usage which directly impacts the number of cell sites and aggregate frequency usage.

D. Service Offerings

The fixed wireless service will be a new offering for Pioneer Cellular, therefore actual plans and related pricing structures have not been developed. The speed provided will meet or exceed the minimal requirement set by the FCC. Pioneer Cellular's general partner provides many bundled and unbundled services and speeds. Upstream boost are available today to meet this FCC upload speed offering. All services and rates can be reviewed at PTCI.com.

Bundled Internet (Internet + Landline)

	Internet with landline	Discount with Bundled Internet and DTV discount	Bundled Internet and DTV price	Min / Max speeds for network config purposes
Lite	\$39.95	\$10.00	\$29.95	256K - 1.5Mb
Essential	\$49.95	\$10.00	\$39.95	2.0Mb-4.0Mb
Preferred	\$59.95	\$10.00	\$49.95	4.5Mb - 8Mb
Premium	\$74.95	\$15.00	\$59.95	8.5Mb - 16Mb
Elite	\$89.95	\$15.00	\$74.95	16.5Mb - 30Mb

Unbundled/Stand Alone Internet (Internet without Landline)

	Stand Alone Internet	Stand Alone Internet with Stand Alone DTV discount	Stand Alone Internet with Stand Alone DTV	Min/Max speeds for network config purposes
Preferred	\$69.95	\$5.00	\$64.95	4.5Mb - 8Mb
Premium	\$84.95	\$5.00	\$79.95	8.5Mb - 16Mb
Elite	\$99.95	\$5.00	\$94.95	16.5Mb - 30Mb

*Elite plan requires bonded or VDSL

*Expanded upload available only on Preferred, Premium and Elite

*The Upstream Boost add on is \$5.00 for up to 1.5 Mbps or \$10.00 for 3 Mbps upstream speeds

E. State, Local or Tribal Participation

The state of Oklahoma has many tribes. Pioneer Cellular coordinates with the tribes to coordinate ongoing joint initiatives and is a provider of services.

The chart below lists the county and the corresponding Tribal Jurisdiction.

County	State	Tribal Jurisdiction	County	State	Tribal Jurisdiction
Alfalfa	OK	none	Custer	OK	Cheyenne-Arapaho Tribes of OK
Grant	OK	none	Beckham	OK	Cheyenne-Arapaho Tribes of OK
Harper	OK	none	Custer	OK	Cheyenne-Arapaho Tribes of OK
Major	OK	none	Blaine	OK	Cheyenne-Arapaho Tribes of OK
Woods	OK	none			Wichita & Affiliated Tribes
Woodward	OK	none			Caddo Tribe
					Delaware Nation

F. Existing Providers

The tracts proposed for service by Pioneer Cellular have eleven (11) existing providers. The providers within the tract, however, are outside the census blocks in which proposed funding is available. The existing providers include:

AT&T, Cable One, DWL Holding Company, Hudson Technology Solutions, KanOkla, Omega 1 Networks, South Central Telephone Association, Southwest Oklahoma Telephone Company, Suddenlink, Verizon and Windstream

G. List of Anchor Institutions

There are many anchor institutions within the tracts Pioneer Cellular is proposing to serve. For an easy reference, the table below lists the institutions by community's area being served. The corresponding tracts are provided in the geographic territories section.

ANCHOR INSTITUTIONS								
COMMUNITIES	SCHOOLS	LIBRARIES	COLLEGE	HEALTH	POLICE	FIRE	GOVT	TOTAL
ALVN	8	1	1	2	4	4	2	22
CHEROKEE	8	2	0	2	5	9	7	33
CLINTON	10	2	0	3	4	2	2	23
ELK CITY	12	2	1	6	6	7	4	38
FAIRMAN	3	1	0	3	2	5	1	15
MEDFORD	5	1	0	3	4	4	5	22
WEATHERFORD	8	2	1	2	5	4	6	28
WOODWARD	16	2	1	6	9	8	5	47

H. Funding Proposed

Pioneer Cellular, through a rough estimate determines the total cost to serve the 3,740 high and extreme high cost locations within the 24 tracts is \$7,570,000.

Community	Number of Sites	Cost Per Community	List of Tracks	High and Extreme High Cost Locations
Alva	3	\$844,500	40151954200 40151954300	335
Cherokee	1	\$295,100	40003955600 40003955700 40003956000	157
Clinton	3	\$849,300	40039950800 40039960400	351
Elk City	5	\$1,527,100	40009966100 40009966200 40009966500 40009966800	957
Fairview	2	\$633,100	40093955200 40093955300	457
Hitchcock	1	\$275,900	40011958800	93
Medford	1	\$281,300	40053956500	111
Weatherford	5	\$1,393,600	40039960600 40039960700 40039961000	512
Woodward	5	\$1,470,100	40059952100 40153953100 40153953200 40153953300 40153953400 40153953500	767
Totals	26	\$7,570,000	24 Tracts	3,740

Pioneer Cellular proposes to receive a one-time funding support for the site construction costs in order to serve the locations within each tract.

I. Project Timeline

Pioneer Cellular proposes to complete 26 site builds within one and one half (1 ½) years from the receipt of funds.

J. Comments

In review of the area served and the technology proposed, Pioneer Cellular would prefer to have the ability to receive support on a census block basis. The funding should be offered to the recipients on either an up-front lump sum basis or annualized support for operations.

The FCC will need to take into account and develop a process to handle applicants that reside in states where the Utility Commissions have frozen or have extremely long processes to grant ETC status.

Pioneer Cellular is honored to have the opportunity to submit the non-binding Letter of Interest to the FCC for the high cost un-served areas.

Should you have any questions from our submittal to assist the process, please let us know.

Respectfully submitted,



Richard Ruhl
General Manager
Cellular Network Partnership, L.P.