

March 7, 2014

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

Re: **Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

PBT Telecom, Inc. d/b/a Comporium, respectfully submits this expression of interest in the proposed experiments to deploy high-speed, scalable, IP-based networks in rural, high-cost areas using Connect America funding, as outlined in the Order, Report and Orders, Further Notices of Proposed Rulemaking, and Ongoing Data Initiative (“Order”) released by the Commission on January 31, 2014.

### **Background**

PBT Telecom, Inc., d/b/a Comporium, an ETC, is a rate-of-return incumbent local exchange company operating in the Midlands Area of South Carolina. It provides voice and data services to its customers. It has been operating on a continuous basis in these areas since 1903. The service area which comprises 621 square miles is characterized by rural areas encompassing small towns of populations of less than 1,000. PBT Telecom, Inc. is committed to providing reliable, high-quality service, including broadband service, to meet the needs of customers in rural areas of the midlands of South Carolina.

### **Proposed Service Area for The Experiment**

PBT Telecom, Inc. has not made a final determination of all of the affected Census Blocks. All Census Blocks with the town limits of both Ridge Springs, SC and Wagener, SC will be included in the upgrade project in an effort to increase the download and upload speeds of customers in the residential, business, governmental, and educational sectors. Included within the anchor institutions designation in Ridge Spring are Ridge Spring Monetta Elementary and Middle School, Ridge Spring Monetta High School, Monetta Head Start Center and a number of other community organizations that support the community in numerous ways. Included within the anchor institutions designation in Wagener are Cyril B. Busbee Elementary, A.L. Corbett Middle

School, Wagener-Salley High Scholl, Christ Central Institute and a number of other community organizations that support the community in numerous ways. These anchor institutions currently have broadband speeds provided at various levels. It is the intent of PBT Telecom, Inc. to deliver service to these locations at levels whereby the service can be more fully utilized. In addition, PBT Telecom, Inc. intends to put in place programs, in partnership with community groups, to assist the region with digital literacy initiatives in a number of subject areas. According to the 2010 Census Data, the population and income statistics indicate that these areas would derive a number of benefits from programs that increase computer usage and knowledge based learning.

In the past, PBT Telecom, Inc. has been limited in its funding capabilities and has not been able to upgrade these areas from copper distribution plant to fiber plant enabling the company to provide FTTH. With the advent of additional support funding from the Connect American Fund and its associated components, these areas will be able to have this fiber-based service provisioned to them to enhance their quality of life.

All facilities provisioned in these areas will be able to be upgraded to address the need for increased bandwidth utilization without the need for extensive and costly upgrades to distribution plant and electronics. It is the goal of PBT Telecom, Inc., as the designated ETC, to continue to serve all the customers within the Ridge Spring and Wagener areas with both quality voice services and high-speed, scalable broadband service on a long-term basis.

### **Broadband Technology or Technologies to be Deployed**

Optical fiber technology will be utilized for the connectivity from the serving telephone company office to the customer premise for both residential and business installations by fiber-to-the-home (FTTH) with digital subscriber line (DSL) service as the broadband delivery platform.

### **Contemplated Service Offerings**

PBT Telecom, Inc. intends to increase broadband speeds in the areas as detailed above in the Proposed Service Area for the Experiment.

### **Expected State and/or Local Participation**

PBT Telecom, Inc. plans to seek participation from interested state and local government entities, churches, community organizations and anchor institutions within and adjacent to the project area to expand potentially available funding and educational opportunities.

### **Funding Requested**

The total project cost will be \$3.1 million. The requested funding will provide service within two small towns, Ridge Spring with a population of less than 692 inhabitants, and Wagener with a population of 952. Other areas adjacent to the towns in the company's rural service area will be provided with upgraded service. PBT Telecom, Inc. requests that the project be funded over a

period of twenty-four (24) months with recurring monies to be paid out in the amount of \$1.55 million for the first funding period and \$1.55 million for the second funding period.

### **Anchor Institutions**

#### Ridge Spring

Ridge Spring Elementary and Middle School  
Ridge Spring Monetta High School  
Monetta Head Start Center

#### Wagener

Cyril B. Busbee Elementary  
A.L. Corbett Middle School  
Wagener-Salley High School  
Christ Central Institute

### **Project Timeline**

When approved, it is anticipated that the installation of the components of the project will begin and end within the time span of twenty-four (24) months.

### **Scalability**

The network utilized for the project will have as its backbone a fiber-to-the-home (FTTH) topography that will allow the users of the network to see their bandwidth availability increase as their needs for higher speeds increase. The provision of advanced telecommunications plant will allow for the changes and upgrades to be performed over the lifetime of the service at a negligible additional cost.

### **Public Safety and Reliability of Network**

*"PBT Telecom, Inc. will maintain network reliability using best practices during the experiment. PBT Telecom, Inc. will ensure that all public safety facilities remain reliable and functional, and that essential communications services for safety of life and national security are maintained. Backup power systems will continue to meet all regulatory requirements."*

Respectfully submitted,



L.B. Spearman  
Vice President

LBS/