



March 7, 2014

Via Electronic Comment Filing System

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

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for Panora Communications Cooperative, ("Panora") and Guthrie Telecommunications Network, Inc., ("Guthrie") regarding the Connect America Phase II network experiments. Panora and Guthrie appreciate the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

Andrew Randol
General Manager
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Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

Panora Communications Cooperative, (“Panora”) and its subsidiary Guthrie Telecommunications Network, Inc., (“Guthrie”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is Stage 1 of the FCC’s Phase II experiment proposals and Panora and Guthrie anxiously awaits release of the Stage 2 formal proposal requirements.

Background

Panora and Guthrie are current providers of Internet, telephone and video in west central Iowa. Panora was incorporated in 1919 and becoming a cooperative in 1961. Panora serves over 2,000 customers in Guthrie County, Iowa. The number of customers has grown nearly three-fold since 1970 due to the construction of, and associated lakefront development around, Lake Panorama, which is located just north of the city of Panora, IA. Panora can count on an increase in their service area as development continues, along with expansions of existing, and the addition of new businesses and services that develop to serve this popular recreation area. Management and staff remained committed to the network build plan to ensure their customers would be able to receive advanced technology. As an Independent Local Exchange Carrier, Panora has Eligible Telecommunication Carrier (“ETC”) status within the state of Iowa. As a Competitive Local Exchange Carrier, Guthrie has ETC status within the state of Iowa. Both have been and currently are a recipient of Universal Service Funding and have extensive experience with the requirements of filing required reports and maintaining support.

Panora and Guthrie are proud to provide small town personal service, and pride themselves in bringing their customers high quality services and looking for opportunities where it can expand their fiber reach in order to bring broadband to areas currently lacking service. Panora and Guthrie are looking forward to bringing this level of service and small town commitment to more areas in Iowa.

Proposed Service Area

The proposed service area covers the following census tract numbers: **19077950100, 19077950200, 19077950300**

The project is estimated to provide broadband access to a total of 798 locations once completed, which are considered Eligible High Cost locations. The proposed area is in Guthrie County in Iowa, which is in and next to Panora and Guthrie’s current serving areas. The proposed project will serve rural locations surrounding Panora and Guthrie Center in Iowa. Panora and Guthrie currently have fiber and wireless broadband in their exchanges and would be looking to expand their broadband footprint to other locations listed above as well. This project would allow Panora and Guthrie to extend their reach by building out their network to deliver broadband.

Once completed, the proposed project is estimated to provide broadband and voice access to a total of 798 eligible high cost to serve locations based on the Federal Communication Commissions (“FCC”) Public Notice, DA 14-154, report dated February 5, 2014 for price cap areas. Of these locations, 300 are extremely high cost to serve locations.

Panora and Guthrie are unable to determine the total number of Community Anchor Institutions (“CAIs”) located within the proposed project since the eligible unserved high cost census blocks within the selected census tracts have yet to be identified; however, Panora and Guthrie currently services many CAIs within their current exchange area and, if funded, could offer scalable high-speed broadband to CAIs located within the proposed service area and customers would be willing to interact with CAIs, where it may not be possible in unserved areas.

The proposed area sits in the west central section of the State of Iowa. Guthrie Center, IA is the county seat. As of the 2010 US Census Data, 10,954 people resided within the county, with approximately 5,756 housing units. The median household income is \$49,114, with 9.2% below poverty level. Population density is approximately 18 persons per mile.

Broadband Technology

In order to utilize CAF support economically, Panora and Guthrie anticipates utilizing a hybrid of Fiber to the Premises (FTTP) and fixed wireless technologies for this proposed project area in order to build a high-speed, robust, scalable broadband network. Additionally, Panora and Guthrie would extend fiber where feasible from existing fiber endpoints and utilize existing towers with a combination of lightly licensed and unlicensed wireless spectrum for other areas to provide broadband service to as many customers as possible. Both network architectures would provide a robust, broadband networking solution with the flexibility to meet the customer demand for two-way, interactive, multimedia-based services. A hybrid FTTP and fixed wireless technology will enable Panora and Guthrie the ability to offer a variety of communications and entertainment services, including carrier-class telephony, high-speed Internet access, digital multimedia, Voice over Internet Protocol (VoIP), and interactive, two-way broadband services. Panora and Guthrie have extensive experience with building and maintaining an extensive FTTP and fixed wireless network.

Partnerships

Panora and Guthrie are would pursue network construction partnership discussions with local utility cooperatives and companies. These local utility cooperatives and companies provide service to a vast majority of the proposed area, which are located within the FCC’s designated unserved census tracts. The potential partnerships provide a unique opportunity for additional local employment, economic development and a rural community based approach to provide broadband service to unserved locations.

Service Offerings

The service offerings anticipated by Panora and Guthrie consists of voice service and high-speed broadband service. Panora and Guthrie are planning on offering voice services at rate based on nationwide benchmarks and broadband services would follow current broadband pricing.

Funding

Panora and Guthrie do not have an estimate at this point for this project. Under the Rural CAF Experiment program, we are expressing interest in serving rural central Iowa. The size of the project depends substantially on the amount of support awarded to the project. Panora and Guthrie are ready to start this project if selected and funding secured. The funding under the Rural CAF Experiment would be requested as an upfront one-time payment. This funding would help offset this cost and allow Panora and Guthrie to build an efficient, state of the art hybrid FTTP and wireless network, which will ensure that all rural residents in the proposed area will have access to high-speed internet and voice.

Conclusion

Panora and Guthrie appreciate the opportunity that the FCC is providing by allowing rural local exchange carriers to submit an Expression of Interest for the Rural CAF Experiment. As stated above, Panora and Guthrie are considering a hybrid FTTP and fixed wireless network build within central Iowa if the funding would be made available. The hybrid network would provide the residents, business and CAI's with a high-speed, robust, scalable broadband network. The network architecture Panora and Guthrie are considering would provide an economical, robust, broadband networking solution that offers virtually unlimited bandwidth to an area that has been lacking service.

Panora and Guthrie are very strong, healthy, dedicated and committed rural telecommunications providers. The staff is extremely knowledgeable and holds the wherewithal to complete the hybrid FTTP and fixed wireless overbuild and to see it to full fruition while delivering advanced services to each person who lives and works within the proposed service area.