



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 Twin Lakes Telephone Cooperative Corporation, (“Twin Lakes”) regarding the Connect America Phase II network experiments. Twin Lakes appreciates the opportunity to file the non-binding EOI.

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

Respectfully Submitted,

A handwritten signature in blue ink that reads 'Jonathan West'.

Jonathan West
General Manager
jwest@twlakes.coop
(931) 268-2151

Attachments (Non-binding EOI and census blocks)

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

Twin Lakes Telephone Cooperative Corporation, (“Twin Lakes”) 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 Twin Lakes anxiously awaits release of the Stage 2 formal proposal requirements.

Background

Twin Lakes is a phone, internet, and television provider in Tennessee. Being a cooperative, Twin Lakes is member owned and has been servicing our member subscribers since 1951. We offer service in fifteen exchange areas in Tennessee which are: Baxter, Byrdstown, Celina, Chestnut Mound, Clarkrange, Cookeville South, Crawford, Gainesboro, Granville, Highland, Jamestown, Livingston, Moss, North Springs, and Rickman.

Twin Lakes has a successful proven history as a communications provider. Twin Lakes has deployed fiber to certain exchanges within our service area, however hasn’t been able to upgrade all rural exchange areas due to the high cost of deploying fiber in our geographical area. Twin Lakes could service all of its rural subscribers with high-speed broadband with the assistance of funding. As an independent local exchange carrier, Twin Lakes has Eligible Telecommunication Carrier (“ETC”) status in their fifteen exchanges. Twin Lakes has been and currently is a recipient of Universal Service Funding and has extensive experience with the requirements of filing required reports and maintaining support.

Proposed Service Area

As stated above, Twin Lakes needs government funding to bring improved high speed Internet to their remaining rural current service exchanges; therefore the proposed service area covers one hundred sixty-three census blocks within fourteen census tracts located in seven Tennessee counties. The eight exchanges that would be part of the proposed service area would be rural areas of Baxter, Chestnut Mound, Crawford, Gainesboro, Highland, Livingston, North Springs, and Rickman that cannot receive 3 Mbps down and 768 kbps upstream today. The counties included in the proposed project are Clay, Dekalb, Fentress, Jackson, Overton, Putnam, and Smith. A listing of the proposed census tracts and census blocks by county are attached to the end of this EOI. If funded, the proposed project is estimated to provide high-speed broadband access to an estimated total of 1,051 customer locations once completed.

Broadband Technology

Due to the topography of the region that varies from rocky mountainous plateaus in the northern sections to sharp peaked and rolling hills in the southerly portions of the Twin Lakes service area with narrow valleys and deep gorges are common. The use of wireless to serve the study area would not be practical from a service or an economic stand point. Therefore, as a general plan, Twin Lakes has selected a Gigabit Passive Optical Network which utilizes a point to multipoint, Fiber-to-the-Premise (“FTTP”) architecture in which unpowered optical splitters are used to enable a single optical fiber to serve multiple establishments, terminating in the Broadband Loop Carrier (BLC) unit and then to the host switch. Twin Lakes would construct FTTP from an existing BLC to the subscribers in the listed census blocks for the proposed project in order to build a high-speed, robust, scalable broadband network.

The FTTP network architecture would provide a robust, broadband networking solution that offers virtually unlimited bandwidth and the flexibility to meet the customer demand. FTTP technology will enable Twin Lakes the ability to offer a variety of communications and entertainment services, including carrier-class telephony, high-speed Internet access, digital media, Voice over Internet Protocol (“VoIP”), and interactive, two-way broadband services. Twin Lakes has extensive experience with building and maintaining a high quality telecommunications network.

Service Offerings

The service offerings anticipated by Twin Lakes are voice service, high-speed broadband service, and video service. Twin Lakes estimates the proposed project to be completed within 24 to 36 months of award date. The pricing for proposed services has not yet been determined by Twin Lakes, but is expected to be similarly priced with services offered currently within their service territory. The broadband speeds expected to be available to all homes and businesses passed, including CAIs within the proposed project area, are up to 1000 Mbps with symmetrical and asymmetrical offerings available. Broadband pricing currently starts at \$39.99, where the service is available. Voice service will be offered to both business and residence, which currently starts at \$14.

Currently, Twin Lakes video service offers a competitive line up, with a full selection of movie channels, sports channels, wide selection of movie packages, whole home DVR, and a wide selection of channels available in HD. The proposed service area will be offered the same services as those in currently available Twin Lakes areas.

Funding

Twin Lakes estimates this project to have a total cost of approximately \$11.8 million. The anticipated requested funding amount will be one time support of \$8 million and \$3.8 million requested over a five year period. The funding request is due the cost of building a robust, scalable, high-speed broadband and voice network in rural Tennessee. Once the final rules and budget for the Rural CAF Experiment are released by the FCC, Twin Lakes will better define the project and the applicable costs should a formal proposal be submitted.

Conclusion

Twin Lakes appreciates the opportunity that the FCC is providing by allowing rural independent local exchange carriers to submit an Expression of Interest for the Rural CAF Experiment. As stated above, Twin Lakes is considering a FTTP technologies network build within their current service exchange. By funding the proposed project, Twin Lakes can reach out to its current residents and businesses that lack access to high-speed broadband capabilities due to their rural Tennessee location. The Twin Lakes proposed fiber network would provide the residents, businesses, and community anchor institutions with a high-speed, robust, scalable broadband networking solution that offers virtually unlimited bandwidth to areas that has been lacking high-speed service.

Twin Lakes is committed to providing a solution to the challenges the residents and businesses have with the current lack of high quality and dependable high speed broadband. Twin Lakes is an experienced, dedicated, and committed telecommunications provider. The experienced staff is extremely knowledgeable and holds the resources to complete the proposed overbuild of the proposed project area and deliver advanced services to each person who lives and works within the proposed service area year round. The proposed project cannot be completed without FCC funding. Thank you for taking this proposed project into consideration as the final rules and budget are set for the available experiments.

**Twin Lakes Telephone Cooperative Corporation
Proposed Census Tracts/Blocks By County**

OVERTON County - 47133				
Track	block Group	Blocks		
950600	1	1008		
		1011		
		1012		
		1014		
		1017		
		1020		
		1022		
		1024		
		1027		
		1038		
		1043		
		1044		
		1045		
		1046		
		1054		
		1056		
		1058		
		1059		
		1060		
		950600	2	2002
2006				
2007				
2014				
2015				
2018				
2019				
2021				
2022				
2023				
2024				
2026				
2039				
2044				
2047				
950100	2	2001		
		2004		
		2008		
		2010		
		2015		
		2025		
		2031		
		2051		
		2056		
		2064		
950100	1	1033		
		950301	1	1009
				1011
				1012
		950200	1	1026
1028				
1043				
950500	3			3009
		3010		
		3017		
		3053		
		3059		
		3065		
		3072		
		3074		
		3075		
		3077		
950500	1	1048		
		1057		
		1003		
		1051		
		1049		
1052				

CLAY County - 47027		
Track	block Group	Blocks
955000	2	2084
		2085

JACKSON County - 47087		
Track	block Group	Blocks
960100	1	1010
		1013
		1015
		1025
		1028
		1032
		1042
		1045
		1047
		1049
960100	2	1059
		1069
		2000
		2009
960100	2	2017
		2019
		2021
		2025
		2034
		2036
		2038
		2039
		2060
		2063
960300	2	2064
		2065
		2066
		2067
		2069
		2082
		2083
		2007
		2020
		2021
960300	3	2022
		2023
		2034
		960200
1000		
1004		
1006		
960200	2	1008
		2009
		2011
		2015
960400	1	2020
		2023
		2028
		2051
		2051
960400	1	1000
		1006
		1008
		1024
		1069

PUTNAM County - 47141		
Track	block Group	Blocks
001000	1	1000
		1007
		1009
		1016
		1022
		1028
		1029
		1032
		1033
		1034
001000	2	1101
		1102
		2020
		2024
		2025
2030		

DEKALB County - 47041		
Track	block Group	Blocks
920300	4	4035

SMITH County - 47159		
Track	block Group	Blocks
975300	1	1001
		1002
		1006
		1019
		1089
		1090
		1092
		1108
		1119
		1120
		1125
		1124
		1127
975300	1	1129
		1131
		1151

FENTRESS County - 47049		
Track	block Group	Blocks
965300	2	2000