March 7, 2014

Letter – Expression of Interest
VIA ECFS

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

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

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

This letter is to express Minnesota Valley Television Improvement Corporation’s (dba MVTV Wireless) interest in receiving funding from the Rural Broadband Trials announced at the January 30th FCC Open Meeting.

Background
MVTV was incorporated in 1960 as a member owned cooperative (LPTV) in order to bring UHF/VHF television to the rural unserved communities surrounding Granite Falls, Minnesota. In 2010 MVTV completed its Digital Transition and is currently (March 2014) marketing HD and expanded program services utilizing an over-the-air encryption system.

In 1999 MVTV began providing internet service throughout its BTA #477 in the 2.5GHz licensed spectrum. In 2012 MVTV completed its BRS Band Plan transition in conjunction with T-Mobile USA.

In March of 2010 MVTV was an Awarded a $1.4 million ARRA/ BIP project to expand broadband to underserved communities. The ARRA project was completed within its original timeline and budget. Currently the ARRA funded WiMAX network supports more than 2000 rural households and businesses with service packages up to 7Mbps download/3Mbps upload.

As a rural market focused Television and Internet provider MVTV understands the true need for advanced services in the under and unserved areas of Southwest Minnesota. Our current footprint contains approximately 20,000 square miles of rural Central and South Central Minnesota with 115 operational fixed wireless access points. Eighty-Five percent of our current customers reside within Minnesota townships; generally the most difficult locations for existing incumbent providers to reach with adequate broadband service.
MVTV has identified 6 Minnesota Counties directly contiguous to existing service areas and identified as eligible by the FCC. (MVTV currently operates in portions of 3 of these Counties)

Those Counties with associated Census Tracts are:

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**Proposed technology**

MVTV is proposing a next generation fixed wireless, LTE/LTE-A, to accommodate the needs of these rural areas for advanced services. As a fixed provider, utilization of mobile based technologies allows MVTV to take advantage of high capacity throughput base stations in lower population density areas to provide greater throughput on an individual customer basis. (Our current WiMAX-IEEE 802.16e-2005 deployment is capable of more than 10Mbps download and 4Mbps upload per customer in a production environment.) The WiMAX/LTE/LTE-A deployment proposed for these targeted areas will be capable of 4-Carrier/4th Order Diversity equating to a production environment that promises delivery of 20-30Mbps download per subscriber.

MVTV estimates residential pricing for service levels in the 10-20Mbps range to be in the $75 to $85 per month without assistance. Based on the level of Federal assistance, MVTV is confident it could deliver broadband services at 40% of this price range.

Operating in a competitive environment, MVTV estimates that in can acquire approximately 30% of the identified 6203 Eligible High Cost Locations; with a majority considered Extremely High Cost (2289).

**Project Timeline**

Core infrastructure for this project can be constructed within 6 months of commencement. Core Extension can be completed within 18 months based on demand. Subscriber acquisition is estimated to be no more than 50-75 per month and again based on demand, but completed within 3 years of project commencement.

MVTV, incorporated as a non-profit, member owned cooperative, has always pursued areas that have
consistently been defined as underserved or unserved, and have always considered its services an alternative to less than adequate products in a competitive environment.

**Investment Needed**
One time Core Infrastructure investment is estimated to be $526,430.
One time Extension Infrastructure investment is estimated to be $235,340.
Customer Premise Equipment and Installation in estimated to be $390 per subscriber.

**Total Project Cost**
Total one time funding with minimum assumption of 50 customer acquisitions per month over a 3 year period: $1,463,770.

Thank you for considering our Expression of Interest in your decision making process. We believe in and strongly encourage the utilization of CAF funding for near term solutions that provide an equitable opportunity for our County’s rural residents and businesses.

Sincerely,

Daniel L. Richter
President
Minnesota Valley Television Improvement Corp.
dba MVTV Wireless