



March 7, 2014

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

Re: Expression of Interest Letter – WC Docket 10-90, Connect America Fund

Dear Ms. Dortch,

This letter is submitted to Express Interest in participating in the Rural Broadband Experiments. Plains Telephone Cooperative Association, Inc. (“Plains”) is an incumbent Rate of Return local exchange carrier (“RoR LEC”) providing voice for over 60 years and broadband services for over 12 years to rural consumers for in rural Colorado with an average density of 0.7 customers per square mile. In 2010 Plains received an American Recovery and Reinvestment Act (ARRA) loan and grant from the Rural Utilities Service to deploy broadband within its study area, bringing state of the art Fiber to the Home facilities to its customers. Also in 2010, Plains joined 10 other RoR LECs in founding the Colorado Communications Transport (CCT), to provide cost efficient middle mile service to LECs and wireless providers in northeastern Colorado. This commitment to remote high-cost areas demonstrates that Plains has the experience and dedication to rural consumers needed to successfully deploy broadband in unserved areas.

Broadband networks, particularly high-speed broadband networks, are expensive to build and cost recovery typically requires multiple years in rural high-cost areas and Plains is very interested in partnering with the FCC to conduct experiments to find creative ways of deploying high-speed, scalable, IP-based networks in rural high-cost areas. In particular, Plains recognizes the need for service to be available to local schools, hospitals and other anchor institutions to ensure rural economic development and opportunity for all Americans. To that end, Plains will take all steps to ensure our experiments maximize accessibility for all anchor institutions in the proposed areas. The details of our potential experiment may be found below.

Location of Potential Experiments

PLAINS COOPERATIVE TELEPHONE ASSOCIATION, INC.

P.O. BOX 123 • JOES, COLORADO 80822 • TELEPHONE 970-358-4211 • FAX 970-358-4505 • www.plainstel.com

Plains is interested in providing service to eligible locations in Census Tracts within Yuma County, Colorado. According to the FCC’s release of potentially eligible Tracts, there are 920 eligible locations within the Tracts of interest. These locations do not include schools, libraries, hospitals and other anchor institutions as these are in designated “low cost” areas, but they would nevertheless benefit from the experiment.

Census Tract Number	Number of Locations
8125963100	431
8125963200	489

Broadband Technology

Based on the funding level available, Plains would use fiber to the premise to deploy broadband capable network in the census Tracts. The synergy of an existing and operational voice and data network solely IP based will make this integration seamless and cost effective.

Service Offerings

The IP Network described above would be capable of supporting voice, high-speed broadband of at least 15Mbps downstream and 5Mbps upstream and up to 40Mbps. The exact price of these services still need to be determined, however, they will likely be similar to Plains’ current offerings to our existing customers. (see plainstel.com for current pricing)

State or local government Participation or Partnerships

The two towns and the county of Yuma within this service proposal have sought proposals from neighboring service providers and Plains would seek a partnership opportunity with the planning committees to meet their needs. Plains Telephone is the preferred local communications company in Yuma County and has had a local presence for over 60 years.

Necessary Funding

Plains estimates that this experiment will require \$9,800,000.00 to construct the required facilities. Accordingly, the Company would require this amount in one time funding.

Plains Telephone thanks the FCC for the opportunity to participate in this process. Any questions about this letter of interest should be directed to D. Kevin Felty at the information below.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Kevin Felty". The signature is fluid and cursive, with a large initial "D" and a long horizontal stroke at the end.

D. Kevin Felty

Plains Telephone Cooperative Association, Inc.

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970-358-4211