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VIA ECFS

March 7, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554  
Attn: Wireline Competition Bureau

**Re: WC Docket No. 10-90  
Rural Broadband Experiment Expression of Interest – Rate-of-Return Areas  
[SkyLine Membership Corporation]**

Dear Ms. Dortch:

SkyLine Membership Corporation (SkyLine) hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to high-cost areas with additional Connect America funding.<sup>1</sup> SkyLine is a rate-of-return incumbent local exchange carrier serving rural areas of North Carolina and Tennessee.

Currently, SkyLine provides broadband to its customers through Fiber-to-the-Premise (FTTP) and DSL facilities. All locations within its regulated service area are capable of speeds of at least 3 Mbps/786 kbps. However, some of the DSL and copper facilities are aging which may cause achieved speeds to be less than optimal. Furthermore, the DSL and copper facilities will not support the higher broadband speeds necessary to meet current and future customer demands. Funds are needed to replace the older DSL and copper facilities so that SkyLine can reliably provide higher speeds, meet current and future customer demands, and transition to an all-IP network for its customers. The details of the proposed deployment are as follows.

Proposed Service Area

SkyLine proposes to make FTTP available to approximately 6,643 homes and businesses currently served by aging copper facilities in the Appalachian Mountains of northwestern North Carolina. SkyLine will install approximately 480 miles of fiber as part of this project.

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<sup>1</sup> See *Technology Transitions et al.*, GN Docket No. 13-5 et al., Order, Report and Order and Further Notice of Proposed Rulemaking, Report and Order, Order and Further Notice of Proposed Rulemaking, Proposal for Ongoing Data Initiative, FCC 14-5 (rel. Jan. 31, 2014).

Proposed Broadband Service

Broadband, Voice, and IPTV services will be made available, with initial broadband speed availability of 100 Mbps downstream/24 Mbps upstream provided over FTTP facilities. Future broadband speeds may include speeds up to 1 Gbps or more.

Funding

SkyLine requests \$23.1 Million in funding from Connect America Funds in one-time funding.

Timeline

SkyLine expects FTTP service to be available to all premises within three years after construction begins.

SkyLine appreciates the opportunity to provide this non-binding expression of interest. Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jimmy C. Blevins".

Jimmy C. Blevins  
Chief Executive Officer