



Video Direct - 385 E. Elm St. - Lebanon, MO 65536 - 866-680-8433
<http://www.video-direct.tv> - sales@video-direct.net

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 for Price Cap Areas
by Video Direct

Dear Ms. Dortch:

Video Direct hereby expresses interest in participating in the Commission's rural broadband experiments to provide robust, scalable high-speed broadband to unserved high-cost areas with additional Connect America funding.¹ Video Direct is an established Wireless Internet Service Provider serving rural areas in south central Missouri, and proposes deployment as follows.

Proposed Service Area

Camden County, MO census tracts:	29029950300	29029950400	29029950600	29029950700	
	29029950800	29029950900	29029951200		
Laclede County, MO census tracts:	29105960100	29105960298	29105960300	29105960500	29105960600
Miller County, MO census tracts:	29131962500	29131962600	29131962700	29131962800	29131962900

The experiment will fund Video Direct's integration of VoIP and high-speed broadband services into new areas, reaching up to 10,809 high-cost locations and 759 extremely-high-cost locations in census blocks lying within these unserved eligible census tracts.

Proposed Services:

VoIP and Broadband services with broadband transmission speeds of up to 20 Mbps provided over fixed wireless connections. Video Direct's wireless towers are served by fiber optic facilities. For the provision of VoIP,

¹ 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).



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services, Video Direct expects to be granted Eligible Telecommunications Carrier (ETC) status in MO by the third quarter of 2014.

Proposed Technologies

Video Direct proposes to expand its current wireless ISP infrastructure's wireless back haul network with 15 new fixed wireless internet tower locations over an 18 month period. Licensed wireless links will be used in the back haul network to provide each tower location with a 1Gbps Ethernet connection. This expansion will allow us to offer up to 20Mbps or higher broadband service packages to current and unserved customers.

1Gbps tower up-links provide scalability, and will not be limited due to back haul bandwidth issues. We will, when needed, raise tower heights to allow for more access points, and a better and larger coverage area.

Funding

Because the unserved high-cost census blocks within the selected census tracts have yet to be identified, Video Direct is unable to provide a final estimate the construction costs and amount of funding needed. The costs will be identified if and when a formal proposal is submitted.

Background

Video Direct is a leading Cable TV and Internet service provider in the Laclede County, Camden County, and Miller County, Missouri. Video Direct started as a private cable TV service provider in March of 2006 and has offered residential and commercial customers with broadband internet and TV service from the beginning. We offer many different types of data and video service delivery options and solutions from fiber, coaxial Docsis, Media over Coax Alliance (MoCA), fixed wireless, and Ethernet. In the beginning we leased T1 circuits from local telco service providers to provide entry level high speed internet services to customers in areas where dsl, cable, or wireless internet service was unavailable. By 2008 Video Direct was leasing over 10 separate T1 circuits and was providing private data and TV solutions to over 600 residential customers. In 2009 Video Direct began consolidating bandwidth to a multi homed fiber gateway location and building a fixed wireless backhaul network to eliminated the pre-existing T1 circuits along with the creating the ability to provide internet service to the unserved areas in Miller County, Camden County, and Laclede County. As of March, 2014 Video Direct now offers Cable TV and Internet service to over 2000+ customers. We have partnered with a VoIP company to start offering residential and commercial telephony services this year.

Services to Community Anchor Institutions

Video Direct will insure that all anchor Institutions in our funding requested census tracts are offered faster broadband service speeds and discounted rates. Already identified anchors include, but not limited to, schools, libraries, assisted living and healthcare facilities, homeless shelters, HUD living facilities, hospitals, all public city offices and buildings, and the local community centers.



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Video Direct is has been working with local water utilities to monitor and control public water towers in exchange for colocation space on the water towers. Video Direct is seeking to gain support from additional state and local government agencies within the proposed service areas.

Existing Providers

The majority of Video Direct's internet services are provided in areas where there is no other internet service, or where AT&T DSL is still slow enough as to declare areas as "unserved".

Project Timeline

Video Direct proposes to complete the 10 tower expansion in an 18 month period.

Thank you for considering our Expression of Interest in your decision about the amount of funding that will be allocated in the Rural Broadband Experiments. We commend the FCC in this effort to connect rural communities and are ready to help you close the digital divide.

Sincerely,

Shawn C. Peppers
Video Direct
385 E. Elm St
Lebanon, MO 65536