

March 7, 2014

VIA ECFS

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

Re: *Connect America Fund*, WC Docket No. 10-90
Expression of Interest - Rural Experiments

Dear Ms. Dortch:

On behalf of Sunesys, LLC (“Sunesys”), Sunesys is filing this expression of interest to receive funding support to construct and implement the necessary last-mile infrastructure to facilitate the connectivity of over 20 rural hospitals located in Pennsylvania that fall within the scope of “eligible sites,” as determined by the Commission.¹ In addition, the requested funding, as described below, would also allow Sunesys to provide ultra high-speed Wide Area Network service and enable IP-based voice telephony service to at least 50 additional school districts and 25 libraries located in rural Pennsylvania that also lack “Internet access service that delivers 3 Mbps downstream/768 kbps upstream.”² As the Commission stated in the *Technology Transitions Order*, its goal behind the next generation network experiments in rural America is “to identify strategies to ensure that community-based institutions in rural areas, such as schools, libraries and health care providers, have access to next generation services.”³ As described below, Sunesys’s proposed experiment would do exactly that.

¹ Public Notice, Wireless Competition Bureau Identifies Potential High-Cost Areas for Next Generation Network Experiments, WC Docket No. 10-90 (rel. Feb. 26, 2014); *see also*, List of Eligible Locations. Available at <http://transition.fcc.gov/bureaus/wcb/ExperimentEligibleLocationsPN020514.csv> (last visited March 5, 2014).

² *In the Matter of Technology Transitions*, 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 at ¶ 93 (rel. Jan. 31, 2014) (“*Technology Transitions Order*”).

³ *Id.* at ¶ 96.

About Sunesys

Sunesys is a certificated competitive local exchange carrier and interexchange carrier providing telecommunications service and dark fiber in multiple states. Sunesys specializes in deploying large-scale fiber connections to schools, hospitals, libraries and other anchor institutions from Pennsylvania to Illinois to California. Sunesys's business model takes advantage of the infrastructure (fiber) and the technology (Gigabit Ethernet) to provide Wide Area Network connectivity in the Gigabit to 10 Gigabit range, as well as Internet Access service with the capability and flexibility to allow customers to increase their Internet bandwidth without increasing their circuit charges. With respect to its operations in Pennsylvania, Sunesys presently serves over 100 school districts within Pennsylvania with ultra-high speed Wide Area Network connectivity.

Proposed Experiment

As part of the American Recovery and Reinvestment Act ("ARRA"), the Commonwealth of Pennsylvania received broadband stimulus funding awards to support middle-mile broadband infrastructure deployment. Critically, however, much of the last-mile infrastructure still needs to be deployed, particularly to anchor institutions such as hospitals, K-12 school districts and libraries located in high-cost, rural areas of Pennsylvania. Sunesys's proposed experiment would leverage the existing middle-mile infrastructure currently available and deploy last-mile connectivity to over 20 rural hospitals and at least 50 additional school districts and 25 libraries located within eligible sites identified by the Commission, as well as providing additional capacity to the LTE backhaul industry and enterprise customers throughout the Commonwealth.

Currently, hospital systems in Pennsylvania have limited information-sharing capabilities and are limited to regional or county-level data-sharing initiatives. By deploying ultra-high speed data connectivity to rural hospitals located throughout Pennsylvania, this network will facilitate the "Network of Networks" concept of connecting all Pennsylvania-based Health Information Exchanges ("HIEs") to bring together patient data and information that will allow for the continuation of meaningful use, as defined by the Department of Health and Human Services.⁴ This proposed experiment will also enhance the ability of rural health care providers to adopt and fully utilize numerous telemedicine applications and further facilitate the exchange of electronic

⁴ See, e.g., HHS Press Release, *More Partnerships between doctors and hospitals strengthen coordinated care for Medicare beneficiaries*, available at <http://www.hhs.gov/news/press/2013pres/12/20131223a.html> (last visited Mar. 5, 2014) (noting that increased information sharing and coordinated care is an integral component of the Affordable Care Act's provisions aimed at reducing the rate of Medicare spending).

health records to improve coordinated care and thereby realize savings in health care costs, all of which are objectives shared by the Commission.⁵

Funding Needed to Conduct Experiment

Sunesys estimates that a \$25 million grant will enable the construction and implementation for the deployment of a Gigabit to 10 Gigabit broadband service to the rural hospitals and the HIE “Network of Networks” described above, while also allowing Sunesys to provide the additional school districts, libraries and other anchor institutions with the same level of service and which Sunesys has provided throughout Pennsylvania for over 15 years. Once constructed, Sunesys would assume the responsibility for the maintenance and operation of the proposed network and not seek any additional funding.

Please contact me at 267-927-2010 if you have any questions or require any additional information to evaluate this proposed experiment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lawrence Coleman', with a long horizontal flourish extending to the right.

Lawrence Coleman
President
Sunesys LLC

⁵ See in the Matter of Rural Health Care Support Mechanism, Report and Order, WC Docket No. 02-60, 27 FCC Red. 16678, ¶¶ 21-23 (rel. Dec. 21, 2012).