



**Consolidated Electric  
Cooperative**

P.O. Box 540  
Mexico, Missouri 65265-0540  
Telephone: 573-581-3630



March 6, 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

Dear Ms. Dortch:

**Background Information**

Callaway Electric (Callaway), Consolidated Electric (Consolidated) and Kingdom Technology Services Inc. (KTIS) collaboratively are seeking ways to improve broadband service available in Central Missouri. Callaway and Consolidated are electric cooperatives operating in adjacent service areas while KTIS is a wholly owned subsidiary of Kingdom Telephone Company, a Rate of Return (RoR) telephone cooperative whose operating area is encompassed by Callaway.

Over 75 years ago the people in rural Callaway and southern Montgomery Counties formed Callaway Electric cooperative with membership fees and Rural Electric Administration (REA) funds. When nearby privately owned utilities would not serve rural areas, people formed cooperative businesses and took the task upon themselves. Callaway Electric Cooperative is made up of nearly 13,000 residential, agricultural, and small and large commercial meters.

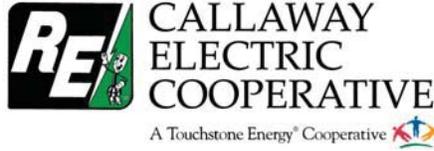
Consolidated Electric is a not-for-profit electric utility owned by the consumer-members who use the electricity and other services it provides. Headquartered in Mexico, Missouri, the cooperative serves parts of Audrain, Callaway, Monroe, Montgomery, Pike and Ralls Counties. Consolidated currently serves more than 7,840 meters for homes, farms, businesses and industry members and maintains more than 2,240 miles of energized power lines.

KTIS is the non-regulated broadband subsidiary of Kingdom Telephone Company serving Broadband throughout seven exchanges in Callaway and Montgomery counties, and also offers fixed wireless Internet service outside the telephone exchange area. A trusted communications leader since 1954, Kingdom provides state-of-the art technology, bringing the world a little closer to home by offering broadband services over FTTH and short loop copper broadband facilities.



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## Proposed Service Area Identification

The collaborative serving area of Callaway, Consolidated, and Kingdom comprises 6,900 Census Blocks within 23 Census tracts in Central Missouri. The combined operating areas in central Missouri encompass 2,447 square miles. All collaborators are dedicated to serving their customers and actively seek opportunities to improve the quality of life of subscribers in their service areas.

### Census Tract Areas:

Callaway County	Montgomery County	Audrain County	Pike County	Monroe County
29027070100	29139970100	29007950100	29163460300	29137960100
29027070200	29139970200	29007950200		29137960200
29027070300	29139970300	29007950300		29137960300
29027070400	29139970400	29007950400		
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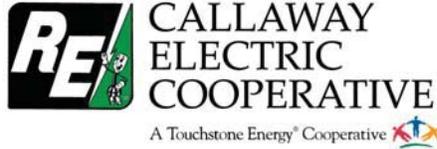
### Community Anchor Institutions

City Government = 9	County Law Enforcement = 2	Municipal Law Enforcement = 7
County Government = 5	911 PSAP = 3	Colleges = 2
Health Dept. = 3	Hospitals = 2	Clinics = 3
Schools = 16	Libraries = 5	U.S. Govt. Offices = 2
Senior Citizen Center = 2	Senior Housing = 1	Elder Care = 3
Fire Districts = 14	Dept. of Family Services = 2	
Community Agency = 4	Community Center = 1	



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### **Broadband Technology**

KTIS is a Broadband service provider providing broadband services over the existing broadband network of Kingdom Telephone. Kingdom Telephone is an Eligible Telecommunications Carrier (ETC) and has made broadband investments since 2001 in their Rate of Return (RoR) service area and most recently has made additional investments in broadband by systematically upgrading the network in their RoR area to a Gigabit Ethernet FTTH network.

FTTH fiber facilities are proposed as the broadband platform in the electric serving areas of Callaway and Consolidated Electric which are with broadband service at the minimum rate of 3Mb/768kbps. The network would be capable of delivering high capacity broadband services over a 2.4 GPON FTTH platform with migration to a 10Gig PON network as well as 1 GigE broadband service as required by business and anchor institutions.

As an existing provider of Voice, Video and Data services, Kingdom Telephone along with the contiguous operating territories of Callaway and Consolidated Electric allows for a seamless integration of technology and operating territories.

Incumbent Price Cap Carriers offer 3Mb/768kbps broadband service providers in select Census Blocks in the service territory, additionally Socket Telecom is operating a FTTH network built with Broadband Stimulus funds along with Farber Telephone (a RoR company) who is offering broadband over FTTH facilities in some areas. These served areas are excluded from any proposed projects.

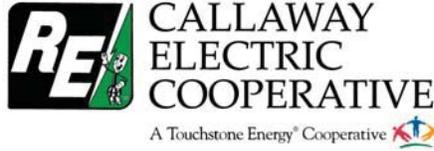
### **Proposed Broadband Service Offerings**

Subscriber services contemplated at this time are representative of consumer comments and existing demand for high quality VoIP voice service, high capacity broadband service and support as well as innovative and cost effective video content solutions. KTIS is an existing provider of broadband service and support as well as Skitter TV service; high quality voice services are easily accomplished from switching capacity available from Kingdom Telephone operations.



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Exact service packages and profiles are not determined but may be similar to:

- Voice – Unlimited or measured local and long distance service
- Video – Skitter TV + Consumer provided OTT solutions
- Data – Symmetrical 10/10Mb, 20/20Mb, 50/50Mb, 100/100Mb, 1 GigE solutions
- SmartGrid – SCADA, Time of use metering, load control, voltage control data acquisition for engineering projects, pre-paid metering, remote connect/disconnect
- Security
- Advanced SLA’s for Home Health monitoring.
- Wireless backhaul services

Pricing for these services is undetermined at this point in time.

**Additional Participation by State, Local and Tribal Governments**

Callaway, Consolidated and KTIS thru their involvement with customers and the community continues to see the need for better broadband facilities.

As existing utilities the collaborative group has access to Right of Way thru existing easements and utility accommodations; easing some requirements for Environmental review and allowing for a quicker ramp up for construction of the network.

**Funding Commitment**

The collaborative group of Callaway, Consolidated and Kingdom proposes to serve approximately 9,409 Unserved locations in 23 Census tracts in the proposed service area.

A high level estimate of total capital funding for the project area is \$46,574,500; engineering studies have not been completed to support this number and the estimate is based on past experience in similar projects.

Based on data regarding Connect America Funding (CAF) in the project area a minimum of \$37,660,420 in one time funding from CAF Phase II funding available in the Census tracts would be requested to complete this project in a 3 year time frame.

Callaway Electric

Consolidated Electric

KTIS

Thomas J. Howard  
General Manager

Mike Fuller  
General Manager

Tom Young  
General Manager