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March 10, 2014

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: WC Docket No. 10-90, Expression of Interest

Ms. Dortch;

C-M-L Telephone Cooperative Association (C-M-L Telephone) hereby provides this “Expression of Interest” in conjunction with the Commission's order<sup>1</sup> initiating rural broadband experiments to provide robust, scalable high-speed broadband to unserved locations in high-cost areas.

### **Background**

C-M-L Telephone is an incumbent local exchange carrier (ILEC) and provides voice, video and data service to its customers in North West Iowa. The company has 5 employees and has provided telecommunication services to rural Iowa customers since 1963. Today, C-M-L Telephone provides voice, video, and data services to its customers located in the towns of Cleghorn, Meriden, Larrabee, and Archer, Iowa. C-M-L Telephone is currently an eligible telecommunications carrier (ETC) in its rate of return areas, and will apply for ETC status in the proposed price cap service areas upon a successful application for the rural broadband experiment.

### **Description of the Project**

Broadband service has become the most sought after technology by C-M-L Telephone’s rural customers. Customers in the rural areas surrounding C-M-L Telephone’s service territory do not have access to high speed broadband networks. C-M-L Telephone seeks to expand its network and intends to deploy FTTH technology to the unserved eligible locations within the geographic area indicated below.

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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, 20 14).

### **Proposed Technology**

C-M-L Telephone will initially deploy a FTTH network using fiber electronics capable of providing broadband in a range of service options up to one (1) Gigabit Ethernet (GE) service. Greater broadband speeds are achievable with current technology and will be deployed to meet demand on an as needed basis. A network interface device will be installed at each customer location and will be equipped with battery backup capability in case of electrical power outages.

C-M-L Telephone's proposed solution will be deployed over a FTTH system designed to deliver 2.1 Gbps through either a Gigabit Passive Optical Network (GPON) solution or an Active Gigabit Ethernet (GE) solution using the same platform. This system allows the flexibility to meet current and future bandwidth requirements of video, data and voice and easily move to full GE solution if required.

C-M-L Telephone's system will also be scalable to a ten (10) gigabit capacity by simply changing out optical electronics within the deployed system. This allows C-M-L Telephone to increase bandwidth capacity to residential customers, businesses, or anchor institutions to meet future bandwidth demands. In addition, the proposed fiber is capable of providing 100 gigabit connections over 40 wavelengths with today's technology. Once fiber is deployed, the only limitations are the developed electronics available in the market place.

### **Anchor Institutions**

Based on the proposed service area, there are no anchor institutions that are incapable of accessing broadband service at a minimum speed of 3 Mbps downstream / 768 kbps upstream. However, deployment of high speed broadband service will enable these rural customers to access information and services currently offered by anchor institutions as well as commercial businesses. The agriculture industry has become extremely reliant on broadband service for its day-to-day operations. Educational institutions in Iowa are implementing laptop programs which provide students with laptop computers to enhance their educational experience. Without access to high speed broadband service, these students are left behind.

### **Partnerships**

C-M-L Telephone will utilize its existing middle mile infrastructure to minimize construction cost. The company also has connections to a regional and a statewide fiber optic network which provides connectivity to internet backbone providers.

### **Proposed Services and Pricing**

C-M-L Telephone will offer Data, Voice, and Video services to customers within the proposed rural census tracts. The company will offer broadband service at a minimum speed of 8 Mbps Downstream / 1 Mbps Upstream for \$59.95 per month with various service tiers up to 20 Mbps downstream / 4 Mbps upstream for \$179.95 per month. Additional tiers will be added as demand for those services becomes evident.

### **Geography and Eligible Locations**

The company proposes to provide voice, video, and data services through a state of the art fiber network in the following census tracts:

State	County Name	Census Tract	Eligible Locations	Extremely High Cost Locations	Total
IA	Cherokee	19035080200	17	6	23
IA	Cherokee	19035080300	185	54	239
	<b>Total</b>		<b>202</b>	<b>60</b>	<b>262</b>

### **Project Cost / Funding**

The estimated construction cost is a high level estimate based on historical data. The total estimated construction cost for the project is \$1,703,000 and C-M-L Telephone is requesting one-time funding of \$1,703,000.

C-M-L Telephone appreciates the opportunity to provide this expression of interest for funding of rural broadband experiments. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Bruce Johnson  
Bruce Johnson  
General Manager