



March 11, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC20554

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System (“ECFS”) in compliance with Federal Communications (“FCC”) Order, FCC 14-5, is the attached non-binding Expression of Interest (“EOI”) for OmniTel Communications (“OmniTel”) regarding the Connect America Phase II network experiments. OmniTel appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

A handwritten signature in dark ink that reads 'Ronald J. Laudner, Jr.' in a cursive script.

Ronald Laudner
President and CEO
OmniTel Communications
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Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

Omnitel Communications (“Omnitel”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is Stage 1 of the FCC’s Phase II experiment proposals and Omnitel anxiously awaits release of the Stage 2 formal proposal requirements.

Entity Background

Omnitel, headquartered in Nora Springs, Iowa, was founded in 1904 as a rural independent telephone company. For over 100 years, making the communities we serve better places to live, work and play, has been our mission. Of course 100 years ago, we accomplished that mission by supplying these communities with wireline telephone service. Today we are continuing our commitment by providing the most up-to-date fiber optic infrastructure.

A fiber optics network will keep those we serve more connected. The value in this network goes far beyond connecting our communities with their friends and families. It makes it possible for new businesses to relocate in our rural communities. It brings distance learning opportunities to our schools. And it links our medical facilities to major hospitals, bringing world-class medical care and expertise to all of us-no matter where we live.

Omnitel’s commitment spans with its continual planning and its work with neighboring communities to extend out Broadband access.

Proposed Service Area

The proposed service area of this EOI covers the following census tract numbers in Floyd County, Iowa:

19067480100, 19067480200, 19067480300, 19067480400, and 19067480500

In addition, the proposed service area covers the following census tract numbers in Mitchell County, Iowa:

19131560100, 19131560200 and 19131560300

Omnitel anticipates this project would be able to provide Broadband access to a total of 2,031 locations identified by the FCC’s Experiment Eligible Locations spreadsheet considered as Eligible High Cost locations once completed.

Floyd County has a total population of 16,303, a land area of 500.6 square miles, with a population density of 32 people per square mile. The county’s largest city (Charles City) has a population of 7,652. Omnitel has studied the Charles City area over the past several years in an effort to expand Broadband coverage to the residents and businesses. However, financially we have not been able to prove out a business plan that would be an efficient and sound business decision without financial support to aid in the construction. Mitchell County has a total population of 10,772, a land area of 469 square miles, with a population density of 23 people per square mile.

The rural environment is an asset to the quality of life in both Floyd and Mitchell Counties, by providing opportunities for recreation, education, and a choice lifestyle. It is a road block however, to the prosperity of the counties and its citizens. The lack of Broadband is having a negative impact on the communities within these counties.

Omnitel has been and continues to be committed to being a strong supporter of the communities it serves. The proposed projects in Floyd and Mitchell Counties would allow Omnitel to expand its ability to aide community anchor institutions by reaching out to the rural areas that have been lacking broadband. Omnitel is currently researching several opportunities that will enable broadband to be utilized by community anchor institutions in the proposed service areas.

Broadband Technology

Omnitel anticipates building a hybrid network, in which it will build out Fiber-to-the-Premises (FTTP) for a portion of the proposed project area in order to provide a much needed high-speed, robust, scalable Broadband network. Within the proposed service area, where there is any population density at all, only fiber will support the continual increase of broadband demand for the long term without prohibitive upgrade costs. Omnitel will extend out with a Broadband Wireless Access (BWA) network deployment in those most isolated locations, or, until it can be supplanted by fiber technology.

The FTTP network architecture would provide a robust, broadband networking solution that offers virtually unlimited bandwidth and the flexibility to meet the customers demand for two-way, interactive, multimedia-based services for years to come. FTTP technology will enable Omnitel the ability to offer the residents in the rural area with the same level of Broadband services that is being experienced within town. The BWA network will be built using licensed spectrum. The proposed fixed wireless network will be based on a Release 10 (R10) LTE-Advanced design. This technology will allow for isolated locations to be served at a more economically feasible basis. This hybrid design will allow Omnitel to maximize its coverage area, provide Broadband to more users, offer more applications and provide users with an overall better experience.

Omnitel has extensive experience with building and maintaining both extensive FTTP networks and fixed wireless networks.

Service Offerings

The service offerings anticipated by Omnitel will include carrier-class telephony, high-speed Internet access, digital multimedia, Voice over Internet Protocol (VoIP), and interactive, two-way Broadband services. The following speed tiers are expected to be available to all homes and businesses passed within the proposed project area served by FTTP, including Community Anchor Institutions:

- 5MB / 1.5MB
- 10MB / 2MB
- 15MB / 3MB
- 50MB / 5MB
- 100MB / 5MB

In the areas where a fixed BWA is being utilized, OmniTel will offer the following speed tiers:

5MB / 2MB
10MB / 2MB

These speeds, both FTTP and BWA, will be offered at prices comparable to rates in neighboring communities.

OmniTel estimates the project to be completed within 18-24 months of award. Build out will be dependent on construction conditions.

Funding

OmniTel has not completed a detailed engineering design yet to determine actual costs to build out the hybrid FTTP / Fixed BWA network, costs which will be dependent on density, route miles and terrain. As such, OmniTel does not have estimated pricings for the cost to complete this project. It is expected that the project will be able to be completed within the funding constraints proposed for CAF Phase II. OmniTel expects to request funding in equal increments over the construction timeframe.

Once the final rules and budget for the Rural CAF Experiment are released by the FCC and in preparation of submitting a proposal, OmniTel will better define the project to determine the most feasible and efficient network design that will maximize the service area to be covered. In addition, OmniTel will be completing a detailed engineering design prior to submission of its proposal to firm up the actual costs that would be attributed to this project. The funding request of OmniTel is due to the high cost of building a robust, scalable, high-speed broadband and voice network in rural Iowa.

Conclusion

OmniTel appreciates the opportunity the FCC is providing by allowing telecommunication providers to submit an Expression of Interest for the Rural CAF Experiment. We would also like to thank the FCC for taking this proposed project into consideration as the final rules and budget are set for the available experiments. As stated above, we are considering a hybrid FTTP and Fixed BWA network build within the listed census tracts in Floyd and Mitchell Counties in the State of Iowa. The proposed Broadband network would provide the residents, businesses and CAI's with a high-speed, robust, scalable Broadband network. By offering advanced technologies through local customer service, OmniTel seeks to enhance economic development, add to the quality of life of our customers and keep customers connected through broadband. It is estimated that approximately 2,031 locations would be able to gain broadband access upon the completion of the build.

OmniTel is a very strong, healthy, dedicated and committed telecommunications provider. The staff is extremely knowledgeable and holds the wherewithal to complete the FTTP overbuild in addition to the Fixed BWA build within Floyd and Mitchell Counties. Once completed, OmniTel will be able to deliver advanced services to each person who lives and works within the proposed service area.