March 12, 2014

**VIA ECFS**

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

**Re: WC Docket No. 10-90**
**Rural Broadband Experiment Expression of Interest – updated letter from 3-7-14**

Dear Ms. Dortch:

PC Telcorp, Inc., d/b/a PC Telcom ("PC Telcom") hereby expresses interest in participating in the Federal Communications Commission's (the "Commission") rural broadband experiments to provide robust, physically diverse, scalable, high-capacity facilities-based fiber optic and fixed wireless broadband services in unserved and underserved areas in northeastern Colorado. This letter updates PC Telcom's original letter submitted on March 7th primarily with a better definition of proposed technology and services.

**Background:**

PC Telcorp's parent company, Phillips County Telephone Company, is an incumbent Rate of Return local exchange carrier ("RoR LEC") has successfully served the extreme rural areas of northeastern Colorado for over a century. Phillips County Telephone Company was one of the first providers to construct and deploy fiber optic facilities in rural Colorado. It is also a founding member of Colorado Communications Transport, LLC (CCT) providing middle mile connectivity via a self-healing fiber optic ring over hundreds of miles between northeast Colorado and Tier 1 Internet backbone in Denver. PC Telcom has also provided competitive broadband solutions where little or no alternative broadband existed, primarily in neighboring CenturyLink exchanges via cable modem service and fixed wireless, since its incorporation in 2005.

This is an impressive feat given the RLEC territory covers the eastern ½ of Phillips County, a slice of southern Sedgwick, and a slice of northern Yuma County with a total of RLEC serving area of approximately 570 square miles. Phillips County alone covers 688 square miles and Sedgwick 540 square miles. This is larger than the state of Delaware while population densities are approximately 2.5 people per square mile.

With a proven track record of continuous improvement and upgrade of network capacity in some of the most economically challenging services areas while continuing to provide affordable service to all customers, PC Telcom offers the technical skills, business acumen, and a century of successful provision of affordable high quality broadband services to rural consumers to ensure successful completion and long term financially and technically sound operation of the network projects and affordable provision of services for the project it proposes herein.

**Geographic Territory:**

PC Telcom proposes to serve eligible locations in Census Tracts within Sedgwick, Washington, and Yuma counties in Colorado.

According to the FCC's release of potentially eligible Tracts, there are 2,327 eligible and extremely high cost locations within the proposed Tracts. There are 2 fire departments that are within the Eligible and Extreme High Cost areas which will directly benefit from the experiment. PC Telcom estimates an additional 150 eligible and extremely high cost locations in Sedgwick County that appear to be misrepresented as covered by a competitor. PC Telcom further estimates there are 35 anchor institutions within the overall footprint.

| Census Tract Number | Number of Locations (Eligible + Extreme High Cost) | Estimated Total Anchor Institutions | Anchor Institutions in 'eligible & high cost' areas |
|---|---|---|---|
| 8125963100 (Yuma) | 431 + 213 = **644** total (this tract) | 9 | 1 |
| 8125963200 (Yuma) | 489 + 298 = **787** total (" ") | 7 | 1 |
| 8121924100 (Washington) | 440 + 307 = **747** total (" ") | 9 | |
| 8115968300 (*Sedgwick as identified on Ntnl. BB map) | 114 + 35 = **149** total (" ") | 8 | |
| 8115968300 (*Estimated additional locations – PCT) | *Estimated additional Eligible & Extreme cost locations – **150** est. | | |

**Existing Providers:**

Despite broadband mapping indications to the contrary – likely to mistaken data regarding CMRS service – there are no competitive broadband operators in Sedgwick County. Sedgwick County contains approximately 150 additional eligible and extreme high cost locations lacking affordable, reliable low-latency broadband service. PC Telcom proposes to serve these underserved areas as part of this project.

**Critical Community Facilities**

In addition to the fire departments mentioned above there are more than 35 school, healthcare and community institutions within the overall footprint that would benefit from this service.

**Proposed Technology and Service**

While fiber optic to the premises is ideal, it is not always economically feasible in extremely high cost and areas with very low population densities. With advances in fixed wireless broadband, as several Commissioners have noted, fiber optic fed fixed wireless can provide scalable and reliable high capacity at lower cost. PC Telcom plans to offer services that are similar to current offerings – Primarily fiber-fed wireless with speeds starting at 6/1 through at least 15/1 in proposed eligible experimental areas. Fiber-fed locations, if applicable, will be capable of 100 Mb connections and anchor locations up to 1 Gbps if fiber-fed. Costs to subscribers will be similar to PC Telcom's current offerings and can be found at www.pctelcom.coop.

**Local and County Government Participation and Support**

In addition to judicious, proven and reasonable use of advanced wireless and wireline technologies to provide reliable, abundant and affordable broadband services in these areas, PC Telcom proposes to further leverage, extend and amplify the effect of federal funds through public-private partnerships in close cooperation and coordination with its local communities. This is consistent with PC Telcom's lengthy history of successful collaboration with and within the communities it is privileged to serve. PC Telcom further supports practical and realistic proposals such as the use of a dig-once policy to maximize investment, lower costs, and increase competition. PC Telcom further directs the Commission's attention to letters of support for this project filed by the Yuma County Economic Development Corporation, the Yuma County Board of County Commissioners and the City of Yuma, Colorado all dated March 6, 2014 and filed in this Docket WC 10-90 on March 7, 2014 (available at: http://apps.fcc.gov/ecfs/comment/view?id=6017604104). In addition to this existing governmental support, PC Telcom is actively collaborating with area anchor institutions, economic development agencies, schools, libraries, health care institutions and local and county governments to ensure the lowest cost and highest beneficial use of these funds possible.

**Proven and Scalable Technologies**

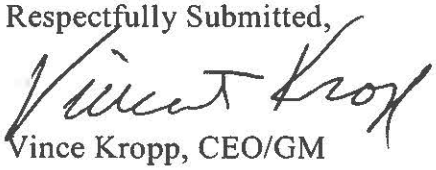
Based upon its extensive experience deploying and successfully operating low cost rural broadband networks, PC Telcom proposes and all-IP network capable of supporting voice, high-speed broadband offered via fiber optic and fiber-optic fed fixed wireless technologies.

**Total Investment**

PC Telcom believes it can offer affordable, carrier-quality, and reliable broadband services on a long-term basis to these substantial areas of northeastern Colorado with a one-time investment of approximately $2.9 – 3.4 million. With greater public / private participation, the required investment may be lower. PC Telcom further proposes additional in-kind contributions, cash and loans of up to 30% of total amounts received to ensure that northeastern Colorado communities, anchor institutions, families, businesses and others are actual and viable long-term participants in the Internet economy.

PC Telcom thanks the Commission and Staff for the opportunity to participate in this process and welcomes any questions, comments and opportunities to provide any further information. Please direct further inquiries to Vince Kropp CEO/GM of PC Telcom or Gary Davis Manager of Plant Operations of PC Telcom at 970-854-2201.

Respectfully Submitted,



Vince Kropp, CEO/GM

PC Telcom
PO Box 387
520 S. Interocean Ave.
Holyoke, CO 80734