

HORIZON CABLE TV INC.

March 12, 2014

Via ECFS

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

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

Dear Commissioners,

This letter is to express Horizon Cable's interest in the FCC's Next Generation Network Experiments Program in Rural America. It is our hope to receive funding from the Connect America Fund to be able to extend broadband service to unserved and underserved areas of western Marin County, CA.

Background

Horizon Cable TV, Inc. is a small privately owned cable television company serving mostly rural areas of Marin County, California since 1987. Horizon currently uses hybrid fiber coax plant to provide video, high-speed internet and recently launched VoIP service.

Technology

Horizon presently uses the DOCSIS 3.0 platform over HFC. It has proven to be economical and robust. We offer internet speeds of 2 Mbps, 10 Mbps, 15 Mbps, and 25 Mbps. Standard prices range from \$22.95 to \$99.95 per month. While the DOCSIS 3.0 platform is capable of much faster speeds, the high cost we pay for internet backbone is a limiting factor for the end user. Since we have received no subsidies, our subscriber base determines how much internet backbone we can purchase and offer back to the customers. Currently, our customers do not receive the full benefit of our HFC DOCSIS 3.0 platform because of the high cost of the middle mile.

With aid from the CAF, Horizon would be able to serve the unserved and underserved locations in our area while also addressing the middle mile issues. Horizon proposes using a RFOG FTTH platform to reach unserved and/or underserved areas in the Census tracts listed below as identified by the FCC. The new FTTH platform will be an extension of our existing HFC network, providing advanced video, voice and data services. We will also have available Gigabit Passive Optical Network (GPON) for businesses and anchor institutions requiring even greater data rates.

Geography

The Census tracts below are the areas the FCC has determined to be unserved or underserved in Marin County, CA. The tracts cover an area of roughly 276 square miles. It is these "high cost" and "very high cost" areas that Horizon would consider extending service to after a thorough analysis of the census blocks. Many areas within the census tracts are presently served by wireline operators such as Horizon,



AT&T and Comcast. The Geography consists of small towns, dairy and cattle ranches, National and State parklands. The terrain includes both coastal and mountainous areas which further contribute to high regulatory, engineering and construction costs.

"CA","06041","Marin","06041101100",13,0,11776.37
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Temporary Regulatory Relief

The nature of rural broadband deployment is the very reason for such a government assistance program. If these areas were not rural, with their inherent obstacles and high cost structure, the identified unserved and underserved areas would not exist. We need to work together to lessen the financial and regulatory burdens to building in these areas.

In addition to funding support, regulatory relief with some of the following would go a long way to insure rapid deployment of broadband services at a minimum cost to taxpayers:

- Assistance with obtaining Eligible Telecom Carrier (ETC) certification.
- Streamlining of Environmental regulations.
- Streamlining of Coastal Commission reviews.
- Assistance with Certificate of Public Convenience and Necessity (CPCN) applications.
- Streamlining of roadway encroachment permits.
- Streamlining of encroachment permits on State and National Parks/Federal lands.
- Reevaluate utility pole loading "safety factor" requirements.
- Investigate make-ready/pole applications cost.

Summary

Robust broadband has proven to be a necessity in today's modern world. Horizon applauds the FCC's desire to help extend broadband into currently unserved and/or underserved areas and we look forward to partnering with local, state and federal agencies on these future projects. Horizon brought the very first high-speed cable modem service to Marin County and we would very much like to extend our service into some of these difficult to serve areas.

Sincerely,



Kevin Daniel
Horizon Cable TV
President