



1000 Oakbrook Drive
Suite 200
Ann Arbor, Michigan 48104-6794

Phone: 734-527-5700
Fax: 734-527-5790
www.merit.edu

February 28, 2014

Re: Connect America Fund
WC Docket No. 10-90
Expression of Interest – Rural Broadband Experiments

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

Dear Secretary,

It is Merit Network's pleasure to submit the following Expression of Interest for participation in Rural Broadband experiments that may be made available to Research & Education Networks through unused funds from the Connect America Fund.

Merit Network, Inc. is a nonprofit, Member-focused, 501(c)3 organization formed in 1966 to design and implement a computer network between public universities in Michigan. After 47 years of innovation, Merit continues to provide high-performance networking and services to organizations including higher education, K-12, library, health care, government, research, and other nonprofit and service organizations. Merit manages the nation's longest-running private, regional network, which is now facilities-based and has evolved into a Regional Optical Network (RON). Merit's mission is to serve the research, education and public sector communities as a trusted and valued partner. Merit advances member success, research, economic development, collaboration, and professional development by leveraging its network infrastructure, expertise and the value of its member communities. Merit is also Michigan's GigaPoP operator, connecting Michigan universities to the Internet2 network. Merit also provides sponsored Internet2 access to Michigan government organizations, K-12 schools and libraries so students and government employees across the state may benefit from the programs offered.

In 2009 and 2010, Merit received two BTOP awards totaling \$103 million for a \$130 million project to construct approximately 2,300 miles of middle-mile fiber in the unserved and underserved areas of Michigan and northern Wisconsin. Merit's awards also included the construction of over 140 last-mile fiber lateral connections to Community Anchor Institution (CAI) organizations in the rural areas of Michigan. Merit included seven for-profit participants in our awards to form a public-private partnership to ensure that the rural for-profit businesses and residential users would be served via this fiber-optic infrastructure. Merit Network and the project funded by these awards (REACH-3MC) have been recognized nationally in 2013 with the Computerworld Honors Program 21st Century Achievement Award and in 2012 by the White House an Innovator in Infrastructure and "Champion of Change".

The State of Michigan is very decentralized in its connectivity for higher education, K-12, libraries, health care, and local government. Michigan has 57 of 83 counties that are considered rural and is split into two peninsulas. Since 1966, Merit has been the primary provider of network connectivity for the research and education community in Michigan, and provides fiber-optic connectivity across the Mackinaw Bridge to connect the upper and lower peninsulas. Merit has participated in the K-12 & Library and Rural Health Care & Health Care Connect Fund USF programs since their inception to efficiently and effectively utilize federal funding to provide Priority 1 services to organizations in Michigan. Merit's BTOP-funded REACH-3MC project has brought fiber-optic capabilities closer to organizations in the unserved and underserved areas of rural Michigan. However, there is still much more work to be done in rural areas to connect individual school buildings, libraries, and health care facilities in rural areas.

Based on Merit's experience in providing to connectivity to organizations across the entire state for over 47 years, and our experience in building middle-mile fiber and lateral connections to CAIs through the BTOP-funded REACH-3MC project, Merit is well-positioned to continue efforts to expand high-performance, fiber-optic connectivity to K-12 schools, libraries, and health care facilities in rural areas.

Merit has developed a pilot project to connect 172 locations via 1 Gbps fiber in rural areas of Michigan that do not currently have access to affordable fiber-optic connectivity. Merit would manage all construction efforts and deliver an end-to-end managed connection with 1 Gbps capacity and minimal ongoing connectivity fees to the connected entity. It is estimated that this pilot project would cost approximately \$36,752,000 to complete over approximately 3 years. The schools and libraries included in our proposed pilot project are in locations that are unserved by affordable, high-speed, fiber-optic connectivity, and include locations that fall within the unserved census block areas:

- Central Lake Schools: 2 schools
- Eastern Upper Peninsula Intermediate School District: 27 schools
- Ellsworth Schools: 1 school
- Ionia Intermediate School District: 28 schools
- Iosco Intermediate Schools District: 9 schools
- Lakeland Library Cooperative: 79 libraries
- Lewiston Schools: 2 schools
- Newaygo County Intermediate School District: 15 schools
- Plainfield & Whittemore Libraries: 2 libraries
- Upper Peninsula Region for Library Cooperation: 7 libraries

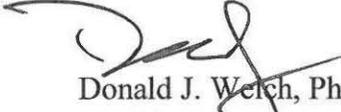
Merit's proposed pilot project could easily scale to include other K-12 schools, libraries, and health care facilities across the entire state of Michigan, to help in achieving President Obama's goal of 99% connectivity for students in 5 years. Such a larger scale project is estimated to cost approximately \$200,000,000 to complete over approximately 5 years.

Through the development of Merit's backbone over the years, as well as the recent addition of approximately 2,300 miles of fiber through the BTOP-funded REACH-3MC project, Merit is well positioned to connect organizations in rural areas through contributions from federal projects like this Rural Broadband experiment. Merit has shown a long-standing commitment to providing high-speed connectivity to K-12 schools, libraries, health care, higher education institutions, government,

and non-profits across the state of Michigan in an ethical and effective way that is driven by our values and our mission as a non-profit.

We hope that you consider our request for participation in this unique opportunity to make a difference for rural organizations in Michigan.

Sincerely,



Donald J. Welch, Ph.D
President & CEO
Merit Network, Inc.