

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Technology Transitions)	GN Docket No. 13-5
)	
AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition)	GN Docket No. 12-353
)	
Connect America Fund)	WC Docket No. 10-90
)	
Structure and Practices of the Video Relay Service Program)	CG Docket No. 10-51
)	
Telecommunications Relay Services And Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities)	CG Docket No. 03-123
)	
Numbering Policies for Modern Communications)	WC Docket No. 13-97
)	

COMMENTS OF [NAME OF COMPANY]

Douglas Service, Inc., dba Douglas Fast Net, hereby files its comments in response to the Federal Communications Commission’s Notice of Proposed Rulemaking in the above-referenced proceeding.¹

At the outset, Douglas Fast Net states that it supports the comments filed by the Utilities Telecom Council. Douglas Fast Net agrees that more funding should be allocated for the rural broadband experiments, particularly given that the expressions of interest have estimated that these experiments could require billions of dollars in Connect America Fund support. In addition, . Douglas Services agrees that the selection criteria and the information requirements

¹ *Technology Transitions*, et al., GN Docket No. 13-5 et al., 79 Fed. Reg. 11366, 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 (rel. Jan. 31, 2014) (Technology Transitions NPRM).

proposed by the Commission should give substantial weight for proposals that would exceed the minimum broadband speeds of 4 megabits per second download and 1 megabits per second upload. Rural America needs robust broadband services, and Douglas Fast Net submits that utilities are uniquely positioned and are technically and financially qualified to deploy robust broadband networks on a cost-effective basis. Finally, Douglas Fast Net agrees that the Commission should enable census tracts and census blocks to be served by rural broadband experiments even if a de minimis amount of the tract or block is currently served by an incumbent price cap carrier or rate of return carrier. Likewise, Douglas Fast Net agrees that census tracts and census blocks that are partially served by price cap and rate of return carriers should also be eligible to be served by rural broadband experiments.

Douglas Fast Net (DFN) plans to provide advance broadband services of between 10 Mbps (up and down) to 1 Gbps (up and down) to homes, businesses, governments, educational facilities and other anchor institutions in portions of Douglas and Lane Counties in Oregon

THEREFORE, Douglas Fast Net thanks the Commission for the opportunity to provide its comments in response to the NPRM regarding the rural broadband experiments.

Respectfully,

Todd Way
Douglas Services, Inc.
2350 NW Aviation Dr.
Roseburg, OR 97470
541.673.4242

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