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May 21, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: Notice of *Ex Parte* in WC Docket No. 13-184
E-rate Modernization
Telepak Networks, Inc. d/b/a C Spire Fiber

Madam Secretary:

In response to questions from Federal Communications Commission staff during the April 21, 2014, ex parte presentation of Telepak Networks, Inc. d/b/a C Spire Fiber (“C Spire” or “C Spire Fiber”),¹ we hereby submit the following information for the record in the above captioned proceeding.

Schools connected to fiber offered by C Spire Fiber

The following school districts or library systems in Mississippi are connected to fiber offered by C Spire for either Internet Access or Wide Area Network (“WAN”) services:

SCHOOL DISTRICTS

Benton County School District	Forrest County School District
Booneville School District	Hattiesburg School District
Clarksdale Municipal School District	Hinds County School District
Clinton Public School District	Holly Springs School District
Columbia School District	Jackson Public School District
Corinth School District	Lee County School District
DeSoto County School District	Marion County School District

¹ See Letter from Jeffrey Mitchell, Counsel for C Spire Fiber, to Marlene Dortch, Secretary, FCC, WC Docket No. 13-184 (Apr. 23, 2014); see also *Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization*, Public Notice, WC Docket No. 13-184, DA 14-308 (Mar. 6, 2014) (“PN”); *In the Matter of Modernizing the E-rate Program for Schools and Libraries*, WC Docket 13-184, Notice of Proposed Rulemaking, FCC 13-100.

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Marshall County School District
Meridian Public School District
Montgomery County School District
North Tippah School District
Perry County School District
Petal School District (July 1, 2014)
Philadelphia Public School District
Poplarville Separate School District
Quitman School District (July 1, 2014)

Rankin County School District
Smith County School District
Tunica County School District
Walthall County School District
Webster County School District

LIBRARIES/LIBRARY SYSTEMS

Lee-Itawamba Counties Library System
Library of Hattiesburg and Petal

Rates for Internet Access and WAN Circuits Offered to Mississippi Schools

As a general response, C Spire Fiber does not offer standardized or postalized pricing for either Internet access or WAN circuits. Both Internet access and WAN installations involve variable costs (*e.g.*, new construction) based on proximity to our facilities and other location-specific factors. C Spire typically recovers these variable costs through monthly rates over the course of a multi-year contract.

Rates Offered for Managed Wi-Fi

C Spire Fiber's recent but growing experience deploying managed Wi-Fi solutions for school districts suggest that the \$21 per student/teacher per year price referenced by Mr. Will Goodman, Director of Technology, Mountain Home School District, Idaho, at the E-rate Modernization workshop on May 6, 2014, is a reasonable average price.²

Sincerely,



Jeffrey A. Mitchell
Counsel for Telepak Networks, Inc.
d/b/a C Spire Fiber

² A recent analysis of C Spire Fiber's 1:1 hosted Wi-Fi deployments and price quotes provided to potential new customers reflects a per student/teacher price ranging slightly below, to significantly above the Idaho managed Wi-Fi price point. C Spire's price variability is due principally to variations in the cost of pulling internal cables or in the number of access points (*i.e.*, classrooms). See also Letter from John Windhausen Jr., on behalf of Education Networks of America ("ENA"), to Marlene Dortch, Secretary, FCC, WC Docket No. 13-184 (May 6, 2014) (ENA is the service provider for Idaho schools and also referenced the \$21 per student/teacher per year price).