



Vermont Telecommunications Authority

March 7, 2014

Filed via ECFS

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

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

Dear Ms. Dortch:

The Vermont Telecommunications Authority (VTA) hereby submits this Expression of Interest (EOI) in the above-referenced proceeding. The VTA is a public instrumentality of the State of Vermont dedicated to developing and funding broadband and cellular infrastructure in unserved and underserved parts of the state.

The VTA anticipates that its actual application will include the involvement of a consortium of companies. Together with the VTA, these companies can share and reduce costs to help facilitate a better business case for robust last-mile broadband service to homes, businesses, and institutions in the sparsely populated and topographically challenging areas of rural Vermont.

The anticipated experimental project by the VTA will provide the FCC the ability to collect data on a variety of topics relevant to its inquiry, including: (i) private-state-municipal collaboration; (ii) an open-access fiber network for use by multiple broadband and cellular service providers; (iii) an integrated last-mile fiber and wireless network designed to both control costs in a rural high-cost area and offer robust service to all; and (iv) a multi-purpose network by design, intended to provide key infrastructure for many public-interest initiatives, including education, health care, libraries, transportation, public safety communications, and cellular services.

Nature of the Entities Applying

The VTA expects that it will act as the coordinating entity in an application that will involve both public and private sector participation. The VTA is not a retail service provider, but works to enable business cases for multiple broadband and cellular providers. The VTA expects to develop basic infrastructure such as dark fiber. It also anticipates assisting in funding other key pieces of the overall network through this project as necessary. These may include fiber and wireless network equipment, and towers or other wireless support structures.

VTA Experience: The VTA has experience with fiber design, construction, and management of its own dark fiber projects and through the oversight of grants to develop fiber optic networks such as Vermont Fiber Connect. It also has direct experience constructing wireless facilities, and has funded a variety of fixed-wireless, small-cell, and conventional cellular projects.

The VTA is experienced with working with federal and foundation funding through a number of sources, including:

- National Telecommunications and Information Administration (NTIA)
 - Through the Broadband Technology Opportunities Program (BTOP), for the Vermont Fiber Connect Project, and
 - Through the Vermont Center for Geographic Information under the State Broadband Data and Development Program
- Bill and Melinda Gates Foundation, through the Vermont Department of Libraries, for the Vermont Fiber Connect Project
- U.S. Economic Development Administration (EDA), through its 2012 Disaster Recovery Program, for the Vermont Cellular Resiliency Project
- Northern Border Regional Commission, for the Northern Borders Connectivity Project.

The VTA's staff has a wide range of applicable experience in both the public and private sectors, including technical, financial management, legal, regulatory, business development, and financing experience. The VTA is governed by a nine-member Board of Directors appointed by the Governor, legislature, and State Treasurer. Its members include former senior Vermont executives for Comcast and Verizon, former members and staff of the Vermont Public Service Board, a former Speaker of the Vermont House, current members of the Vermont House Commerce and Senate Finance Committees, the Deputy State Treasurer, as well as a current state economic development official and owners of web-based businesses.

VTA Relationships and Building a Consortium: Relationships are vital to helping create a collaborative atmosphere where different entities can use the same infrastructure. The VTA serves as a neutral entity that works with multiple providers and users of telecommunication infrastructure. In addition to issuing grants to promote broadband and cellular development in unserved areas, the VTA builds and leases access to its infrastructure. To date, the VTA has developed important relationships either through its grants, through development of commercial contracts to lease fiber or wireless facilities, or through its community outreach

efforts, all on which it will draw on for its FCC Experimental Application. Prior relationships include the following:

- **Retail Broadband Service Providers (Last Mile and Middle Mile)**
 - Cloud Alliance
 - Comcast
 - East Central Vermont Community Fiber Network (EC Fiber)
 - FairPoint Communications
 - Southern Vermont Cable
 - Sovernet
 - Topsham Communications
 - Vermont Telephone, Inc.
 - Wireless Linc
- **Open Access Lit Fiber Services**
 - Civimetrix Telecom
- **Long Haul Providers**
 - 186 Communications
- **Fiber Owners**
 - New Hampshire Optical Systems
 - Northern Enterprises
- **Tower Infrastructure Companies**
 - American Tower
- **Retail Cellular Companies**
 - AT&T
 - Verizon
 - VTel Wireless
- **Wholesale Cellular Companies**
 - Vanu CoverageCo
- **Electric Utilities**
 - Green Mountain Power
 - Hardwick Electric Department
 - Orleans Village Electric Department
 - Vermont Electric Cooperative
 - Washington Electric Cooperative
- **Research Facilities and Education Organizations**
 - Education Networks of America
 - Sealand Waterworks
 - University of Vermont, Internet2, EPSCoR
 - University of New Hampshire
 - Vermont Agency of Education
- **Community Relationships**
 - Northern Vermont Development Association
 - Northern Community Investment Corporation
 - Vermont Council on Rural Development
 - Vermont Department of Libraries
 - Vermont Agency of Transportation
 - Various Towns and Regional Economic Development Organizations

Although it is likely that not all of these organizations would choose to join in a consortium proposal, any of these and others would be welcome to participate. The VTA has good reason to believe that a meaningful portion will be interested. Indeed, the VTA has already received expressions of interest in collaborating on this project from broadband providers Cloud Alliance, Wireless Linc, and EC Fiber. In addition, the University of Vermont (UVM) and the Vermont Unified Community Anchor Network (VT-UCAN) are committed to connecting the Community Anchor Institutions in the VTA's project to the education Internet II. The proposed area would result in a connection to UVM's fiber network to facilitate this connection.

Cloud Alliance and Wireless Linc are service providers that operate wireless broadband services in the region. EC Fiber is an organization formed by an inter-local agreement between 24 member towns to provide Fiber-to-the Premise broadband and voice telephony services in a territory similar to the one proposed for this project. EC Fiber is an existing licensee of VTA

dark fiber. The VTA understands that EC Fiber will file a separate EOI for another proposed area in Vermont within its member towns. The VTA views this EOI as complementary to its own. We expect VTA-funded fiber infrastructure to be an important supporting part of a final proposal in the area proposed by EC Fiber.

Proposed Area

The VTA intends to propose a service area in the eligible blocks within the following census tracts:

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|---|---|
| <p>Bennington County</p> <hr/> <p>Rupert and Sandgate 50003970300</p> <p>Caledonia County</p> <hr/> <p>Burke and Kirby 50005957100</p> <p>Danville 50005957600</p> <p>Hardwick 50005957700</p> <p>Northern Caledonia County 50005957000</p> <p>Western Lyndon 50005957300</p> <p>Essex County</p> <hr/> <p>Brighton 50009950200</p> <p>Northern Essex County 50009950100</p> <p>Southern Essex County 50009950500</p> <p>Franklin County</p> <hr/> <p>Berkshire and Enosburg 50011010200</p> <p>Fairfield and Bakersfield 50011010400</p> <p>Fletcher and Fairfax 50011011000</p> <p>Highgate, Franklin, Sheldon 50011010100</p> <p>Richford and Montgomery 50011010300</p> <p>Swanton 50011010500</p> | <p>Lamoille County</p> <hr/> <p>Waterville, Belvidere, Eden 50015953000</p> <p>Orange County</p> <hr/> <p>Washington and Orange 50017959101</p> <p>Orleans County</p> <hr/> <p>Barton 50019951800</p> <p>Coventry, Brownington, Westmore 50019951900</p> <p>Holland, Morgan, Charlestown 50019951100</p> <p>Lowell, Irasburg, Albany, Craftsbury 50019951700</p> <p>Westfield, Jay, Troy, Newport Town 50019951600</p> <p>Eastern Derby 50019951200</p> <p>Rutland County</p> <hr/> <p>Pawlet 50021964300</p> <p>Washington County</p> <hr/> <p>Cabot, Marshfield, Plainfield 50023954000</p> <p>Calais and Woodbury 50023954100</p> <p>East Montpelier 50023955000</p> <p>Windham County</p> <hr/> <p>Halifax and Marlboro 50025968200</p> <p>Putney 50025967700</p> |
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Please see the attached list of census block numbers.

These tracts contain 14,037 eligible high-cost locations. The area also contains 8 public libraries not reached through the BTOP-funded Vermont Fiber Connect project, more than 35 public school locations, 1 college, more than 20 fire stations, 3 ambulance services, 5 health clinics, and approximately 100 government buildings.

Technologies, Services, and Pricing

The Infrastructure Plan: With Connect America Funding, the VTA and its consortium will build and support a “deep fiber” network to homes, businesses and Community Anchor Institutions. The VTA will build out the passive parts of the network including open fiber infrastructure. Targeted use of wireless infrastructure will ensure that all unserved locations can be reached economically within the available funding. VTA-developed fiber is engineered and deployed to provide frequent access points for last-mile use, as well as protected strands for uses like wireless backhaul, institutional applications, and long distance transport. The VTA keeps its network open on the physical level by capping the fraction of total strands that any one licensee can control. (However, fiber cables are sized to avoid scarcity of strands and provide for future growth.)

The Services Plan: The VTA does not intend to offer retail services directly, but will work in concert with service providers as part of a consortium proposal. The goal is to use CAF funding to reduce the cost of deploying and maintaining basic infrastructure in high-cost areas so that the remaining costs can be supported by private business models. The core service to be provided by the VTA is dark fiber, augmented by wireless facilities and equipment.

At a minimum, the services on the network we expect to be offered by parties other than the VTA are as follows:

- **Fiber-to-the-Premise last-mile broadband Internet service.** The VTA intends to pass as many locations as possible within the funded service area within the budget of the project. For those locations where customer density is extremely low, or there are significant cost barriers (such as lack of pole line continuity) a fixed wireless solution will augment the fiber.
- **Fixed wireless last-mile broadband Internet service.** This supplemental service will be used in limited geographic areas and connected to fiber to ensure that high speeds comparable to, if not always equal to, fiber speeds can be achieved.
- **IP-based voice telephony service.**

In addition, participants may offer the following types of service:

- **Video services.** Likely to be offered in conjunction with an FTTP offering.
- **Cellular service.** Very rural areas lack cellular coverage for the same reason they tend to lack high-speed broadband – the lack of business case. The VTA’s dual mission to support both broadband and cellular service in unserved and

underserved areas of Vermont has resulted in relationships with a variety of cellular carriers. We expect dark fiber or lit fiber services to be an important enabler of high-speed LTE services throughout the region, including the upcoming national Public Safety Broadband Network. We expect fiber to facilitate increased voice and high-speed LTE services. Cellular services in turn provide an alternative voice solution.

- **Wholesale lit fiber transport services.**

The VTA will integrate more than dark fiber into its part of the overall project if that is necessary to ensure that the core services are available. The VTA has supported last-mile broadband and cellular service deployment in the past through low-cost equipment leasing agreements with service providers. If required, the VTA is prepared to make that a feature of this project in order to catalyze provider involvement. Such equipment leasing may include:

- WDM, GPON, EPON, and/or Active Ethernet network equipment
- Tower space
- Fixed wireless broadband base-station equipment
- Cellular base-station equipment
- Subscriber end equipment

Pricing: A summary of current VTA dark fiber pricing and contract templates are available at <http://www.telecomvt.org/Providers/DarkFiber>. Pricing for the other services listed above will be determined by consortium members and will be partially determined by the scope of the project, the engineered design, and the amount of funding support received¹. However, we are striving for prices that are at least comparable to those services offered in other parts of Vermont not receiving support. The lack of exclusive control of the network by any one provider will also provide a market-based check on retail prices.

Expected state, local, or tribal government participation

The State of Vermont has provided the VTA with broad powers to receive and disburse funds; apply for and receive permits; construct, install, own, acquire, sell, trade, and lease equipment, facilities, and other infrastructure that could be accessed and used by multiple service providers, the State and local governments, including fiber optic cables, towers, shelters, easements, rights-of-way, and wireless spectrum of frequencies. It has received funding from the State of Vermont through annual appropriations from the General Fund of the state, as well as periodic capital appropriations. The VTA has the ability to borrow and to issue revenue bonds, with a designated \$40 million bonding authority that can be exercised with a recurring revenue source.

The VTA has acquired rights to 200 miles of open-access dark fiber infrastructure. It intends to use this fiber as the core network for the project from which additional fiber assets are

¹ As an example, we understand that EC Fiber, in its contemporaneously-filed EOI has listed existing and potential service offerings at levels ranging from 5 Mbps symmetrical up to 1Gbps symmetrical service.

extended to assist providers in reaching last-mile residences, businesses and community anchor institutions.

In addition to efforts through the VTA, the State of Vermont has in recent years taken a number of important steps to facilitate the deployment of telecommunications infrastructure, including:

- A streamlined state-level permitting process based on a Certificate of Public Good
- Pole Attachment terms and tariffs that allow providers access to utility poles
- Right-of-way access through the Agency of Transportation

Required Funding

The VTA envisions that it would seek annual support of \$4,635,930 for this project over a ten-year period. In the alternative, the VTA estimates it would require one-time support of \$43.5 million for the project. We understand that the one-time number is substantial, given the contemplated size of the Rural Broadband Experiments program. However, the VTA is a not-for-profit public authority with the ability to raise patient capital through bonding and other borrowing, if backed by a stable recurring revenue stream. Therefore, we believe that this option for annual funding over ten years provides the FCC with an opportunity to demonstrate how federal and state support can work in tandem to make substantial long-term infrastructure investments that can be used by multiple providers.

Conclusion

The VTA supports the steps the FCC has taken to implement this phase of the Connect America Fund. The areas that are part of this proposal represent some of the most difficult-to-serve parts of Vermont. We believe this provides the opportunity to deploy advanced telecommunications infrastructure that will meet the needs in these areas of the region for many years to come. Thank you for your consideration.

Sincerely,



Christopher Campbell
Executive Director

Census Blocks in Proposed Area

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