

From: [Linda Olson](#)
To: [BOCrfc2015](#)
Subject: Broadband Opportunity Council - Comment
Date: Tuesday, June 09, 2015 6:30:01 PM
Attachments: [Broadband Opportunity Council Comment.pdf](#)

Please see attached comments.

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June 9, 2015

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW., Room 4626
Washington, DC 20239

Attn: Presidents Interagency Broadband Opportunity Council

Sent via email to BOCrfc2015@ntia.doc.gov

Dear Council:

The Port of Whitman County is a Washington State Port District with legal state legislative authority to build telecommunications infrastructure. The Port has an extensive network of fiber that reaches from Spokane, WA to Clarkston, WA with extensions off of the backbone service many communities. Over half of Whitman County is reached by Port of Whitman fiber. The Port only leases dark fiber to ILEC, CLEC, and ISP companies who do business in Washington State. The Port has been doing business as a fiber provider since 2000.

The Port would like to comment in a couple areas from the request for comment we received April 29, 2015.

What can the federal government do to make it easier for state and local government or organizations to access funding for broadband?

Here are some key thoughts on this question:

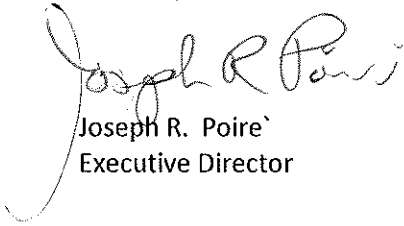
- Be more open in who can apply for funds to serve areas. Many of the telecommunications programs are designed for the incumbent telephone provider to provide the service. Funding for the BTOP rounds in the last five years expanded many networks owned outside of ILEC companies. Then the program switched back to user bandwidth areas taking our network and the \$180,000,000 spent on PUD and Port owned fiber networks in WA State out of contention for funds.
- With the advent of bandwidth requirements climbing to possibly 25 MEG at the home, the legacy copper infrastructure cannot handle the bandwidth. Legacy companies have been able to meet bandwidth requirements by twisting multiple pairs of copper together to serve users. This will not work at the higher bandwidth requirements the Fed is seeking. Fiber must be delivered to the premise. The Port and other

infrastructure providers will lease dark fiber to ILEC and CLEC companies that provide services. A strong incentive to provide services in rural areas is not to be required to build the high cost fiber plant. We ask that the Fed explore more diligently partnering with local infrastructure providers like the Port that will lease fiber in an open nondiscriminatory way to all companies.

- It will be hard to implement and a big change but please start shifting away from funding high cost legacy companies and start focusing on how to fund high cost customers with new approaches. The Port and many other organizations are here to partner.

Thank you for your time and consideration of the Port's input.

Sincerely,



Joseph R. Poire
Executive Director