

**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 MIDWEST ENERGY COOPERATIVE**

Midwest Energy Cooperative (Midwest Energy) hereby files its comments in response to the Federal Communications Commission's Notice of Proposed Rulemaking in the above-referenced proceeding.<sup>1</sup>

**I. INTRODUCTION**

Midwest Energy is a member-owned electric utility serving more than 35,000 residential, agricultural, commercial and industrial customers in southwestern and southeastern Michigan,

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<sup>1</sup> *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).

northern Indiana and Ohio. Our service territory covers 12 counties. Our Southwest District includes portions of Berrien, Cass, St. Joseph, Kalamazoo and Van Buren Counties in Michigan as well as St. Joseph, Elkhart and LaGrange Counties in northern Indiana. Our Southeast District includes portions of Lenawee and Monroe Counties in Michigan as well as Williams and Fulton Counties in northern Ohio. Midwest Energy's corporate headquarters is in Cassopolis, Michigan, with district service centers in Adrian, Paw Paw and White Cloud.

Midwest is pursuing a multi-phased broadband project – ultimately leveraging a 243-mile high-speed communications ring through utility substations and facilities to deploy 1,800 miles of fiber to homes, schools, libraries, critical care facilities, first-responders (police and fire), businesses and a tribal entity in rural, un-and-under-served southwest Michigan. Project costs are expected to top \$63 million of which \$9.5 million is devoted to the communications network. The network provides Midwest Energy members multiple advantages including smarter grid services and access to true broadband. Non-members will simply benefit by having, for the first time, speeds and capacity to truly compete in a global marketplace.

## **II. FUNDING, SELECTION CRITERIA AND PROJECT ELIGIBILITY**

At the outset, Midwest Energy states that it supports the comments filed by the Utilities Telecom Council. We agree 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, Midwest Energy agrees that the selection criteria and the information requirements proposed by the Commission should give substantial weight for proposals that would exceed the minimum broadband speeds of 4 megabits per second (mbps) download and 1 mbps upload. Rural

America needs robust broadband services, and Midwest Energy submits that utilities are uniquely positioned and are technically and financially qualified to deploy robust broadband networks on a cost-effective basis. Finally, we agree 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, Midwest Energy 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.

### **III. MIDWEST ENERGY'S PROJECT & COMMITMENT TO SERVE**

Though our communications backbone will link all substations and facilities, we only plan to provide fiber-to-the-premises with gigabit passive optical network (GPON) electronics in our southwest district. At present, our southeast district is reasonably well-served with multiple options available to members of the cooperative. Those receiving service from Midwest Energy may initially expect a voice option and data plans up to 100 mbps download and 50 mbps upload. Symmetrical service plans are possible and gigabit speeds and video services will ultimately be offered by the company.

As referenced in our expression of interest, Midwest Energy is working with the Pokagon Band of Potawatomi's economic development arm, Mno-Bmadsen, to forge a mutually-beneficial partnership that results in a new, robust service for their members. Additionally, we are exploring partnerships with stimulus recipients, Merit Networks, Inc. and Lynx Network Group, to figure out how best to serve schools, libraries, healthcare facilities, first-responders, the elderly and home-bound.

**IV. CONCLUSION**

**THEREFORE**, Midwest Energy thanks the Commission for the opportunity to provide its comments in response to the NPRM regarding the rural broadband experiments. We believe you'll find partnering with rural electric cooperatives and other utilities is an effective way of closing the rural and urban digital divide.

Respectfully,



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