

*Charles F. Larkin
182 Portal Road
Montpelier, Vermont
05602*

via email

August 27, 2014

Mr. Chris Reccia
Commissioner
Vermont Department of Public Service
Montpelier, Vermont

Dear Commissioner;

I am a former Department of Public Service Telecommunications Engineer, having held that position for over thirty years. I have reviewed the Department's 2014 Public Review Draft of the Ten Year Telecommunications Plan.?

I strongly suggest that the Department withdraw the 2014 Public Review Draft, and inform the Legislature of why you have seen the need to do so.

The reasons for making this suggestion are as follows;

First:?

The 2014 Public Review Draft Plan is missing many statutorily required components such as: an assessment of the current state of telecommunications infrastructure; an assessment, conducted in cooperation with the department of innovation and information, of the current state telecommunications system and evaluation of alternative proposals for upgrading the system to provide the best available and affordable technology for use by government; and an assessment of the state of telecommunications networks and services in Vermont relative to other states, including price comparisons for key services and comparisons of the state of technology deployment.

Second;

The current hearings are being conducted on a Public Comment Draft, not on a Final Draft, as was done in 1999 and 2004, in accordance with statute.

Third;

The Plan encourages the construction of more copper and ADSL deployment, when

neither can provide the symmetric bandwidth required to meet the 2024 goal as defined in Statue, thus?nbsp; such infrastructure would soon be obsolete. This is directly contrary with the goals of 30 VSA,?nbsp; 202c.

Fourth;

The required survey of Vermont residents and businesses was only made public on August 25, 2014. The draft Plan was made public on August 11, 2014. Was the survey received by the Department in time to incorporate its findings into?nbsp; the Public Comments Draft Plan? If not, the absence of the survey is another deficiency in the Plan.

Fifth;

The Plan evades the statutory goal of Open Access, with specious arguments. The Plan should have analyzed both sides of its position, making and presented actions aimed at this important statutory goal.

Sixth;

The Plan promotes further building and even public funding of insufficient bandwidth. It should have set forth specific actions steps aimed at the statutory goal of 100 Mbps, symmetrical..

Seventh;

The Plan does not have any actions to encourage the use of existing facilities in the deployment of broadband infrastructure. Overbuilds of fiber are a waste of public dollars and pole attachment space in the public right of way.

The Department failed to deliver a 2007, 2010 or 2013 Telecommunications Plan. As the 2014 Public Comment Draft Plan is sadly deficient, I suggest that a letter to the Legislature, withdrawing it would not be a violation of the statutory deadline to adopt a plan by?September 1, 2014, as the so-called Plan does not begin to qualify as a plan, and its adoption and issuance by the Department would be an empty act.

I suggest that your letter might inform the Legislature of your acknowledgment of the prior missing plans, the 2014 Draft Plan's deficiencies, and your intent that the Department immediately begin work on a real and complete Plan with the added benefit of the supposedly forthcoming "Action Plan for Broadband" now due in December from the Agency of Administration, as well as the benefit of further oversight and input upon the convening of the Legislature in January.

Very truly yours,

Charles Larkin

An Alternative Proposal for use of Vermont's *Connect America* Funds

by Charles F. Larkin

It is my understanding that some \$45-50 Million may become available to Vermont under the Connect America Fund program. I believe that this is an FCC program which will offer, in effect, a right of first refusal to FairPoint to construct more DSL and copper, supporting 4:1 or 10:1 broadband speeds, instead of fiber. Fiber is the only infrastructure that can meet the State's 202c goal of 100Mbps or faster, symmetrical speeds. This ill-considered build-out of what would soon be obsolete infrastructure, is in direct conflict with the goals of 30 VSA 202c (8) (B) “...or result in widespread installation of technology that becomes outmoded within a short period after installation;”

First, the Public Service Board, the Public Service Department, the Vermont State Legislature, individual legislators and interested citizens, businesses and organizations should petition the FCC to not grant the \$45-50 Million to Fairpoint. Alternatively, the funds should be granted to the State with specific conditions. These monies should be placed in a revolving loan fund usable over and over again to build much more than \$45-50 Million dollars of ADSL and copper, but to build wall to wall fiber across Vermont. We should all ask our Congressional Delegation and Senators for help as well.

DPS should use its power granted under 30 VSA 202d (d) to require all network owners to provide specific location and capacity information regarding their fiber networks. A map showing the location of all fiber could then be used to create an inverse map showing where the fiber is not located or is at capacity. All fiber built under the Revolving Loan Fund program would only be constructed in the fiber free area to prevent further overbuilds.

The ECFiber construction method should be an example of what can be done. It is my understanding that the ECFiber network cost \$30k per mile in areas where it could not connect to the VTA fiber. This was in areas down to six homes per mile. \$30,000 divided over six homes results in a construction cost of \$5,000/mile/home. At \$100 per subscriber/month, this comes to \$1,200 per year or \$4,800 in four years. This approximates a four year payback. At \$50 per month it would require eight years to recoup the investment. Should some portion of these amounts be returning to the revolving loan fund, more communities would then benefit from the same funds resulting in meeting the goal of symmetric statewide fiber, possibly by 2024, if not sooner.

The estimated costs, benefits and jobs creation potential of such a scenario should be laid out in detail in a Ten Year Telecommunication Plan under the provision of 30 VSA 202d (3) & (4). 2014.08.27