



**Broadband Infrastructure Application**  
**Submission to NTIA – Broadband Technology Opportunities Program**

<b>Submitted Date:</b> <b>Easygrants ID: 7080</b>	
<b>Funding Opportunity:</b> Broadband Technology Opportunities Program	<b>Applicant Organization:</b> SILVER STAR TELEPHONE COMPANY, INC.
<b>Task:</b> Submit Application - BTOP	<b>Applicant Name:</b> Mr. Allen R Hoopes

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## A. General Application Information

Applicant Information	
Name and Federal ID for Applicant	
<b>DUNS Number</b>	061463618
<b>CCR # (CAGE)</b>	3G0E2
<b>Legal Business Name</b>	SILVER STAR TELEPHONE COMPANY, INC.
<b>Point of Contact (POC)</b>	CHAD TURNER 3078832411 Ext. 6621 cturner@silverstar.net
<b>Alternate POC</b>	TIKIJO MERRITT 3078832411 Ext. 6674 tjmerritt@silverstar.net
<b>Electronic Business POC</b>	CHAD TURNER 3078832411 Ext. 6621 cturner@silverstar.net
<b>Alternate Electronic Business POC</b>	MICHELLE MOTZKUS 3078832411 Ext. 6690 mamotzkus@silverstar.net

Name and Contact Information of Person to be Contacted on Matters Involving this Application:	
<b>Prefix</b>	Mr.
<b>First Name</b>	Allen
<b>Middle Name</b>	R
<b>Last Name</b>	Hoopes
<b>Suffix</b>	
<b>Telephone Number</b>	307-883-6671



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<b>Fax Number</b>	307-883-2575
<b>Email</b>	ahoopes@silverstar.net
<b>Title</b>	President

**Additional Contact Information of Person to be Contacted on Matters Involving this Application:**

Project Role	Name	Phone	Email
Secondary Point of Contact	Michelle , Motzkus	3078832411 6690	mamotzkus@silverstar.net
Secondary Point of Contact	Ron , McCue	3078832411 6670	rmccue@silverstar.net

**Environmental Point of Contact**

Prefix: Name: Ricks, Karen Suffix: Telephone Number: 3078836631 Title: Engineering Manager
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**Organization Classification**

<b>Type of Organization</b>	For-profit Entity
<b>Is the organization a small business?</b>	No
<b>Does the organization meet the definition of a socially and economically disadvantaged small business concern?</b>	No



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Authorized Organizational Representative	
<b>AOR Name</b>	MOTZKUS, MICHELLE
<b>Result</b>	Applicant Authorized

**Project Title and Project Description**

**Project Title:** Delivering Opportunities: Investing in Rural Wyoming Broadband

**Project Description:** This middle mile project constructs approximately 33 miles of fiber facilities between Jackson, WY and Victor, ID. The project “closes the gap” in an existing 159 mile fiber network that, when completed, will enhance the broadband network opportunities for households and businesses within 11 counties and 26 rural communities in Wyoming and Idaho.

**CCI Priority Checklist**

**The following items were selected from the CCI Priority Checklist:**

1. This project will deploy Middle Mile broadband infrastructure to community anchor institutions.
2. The project will deploy Middle Mile broadband infrastructure and has incorporated a public-private partnership among government, non-profit and for-profits entities, and other key community stakeholders.
5. This project will deploy Middle Mile broadband infrastructure to public safety entities.

**Comprehensive Community Infrastructure Components**

**The following items were selected from the Comprehensive Community Infrastructure Components:**

Middle Mile

**BIP Applicants**

Have you also applied to BIP for funding in the sample proposed funded service area?

- No



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If Yes, please provide the project title and Easygrants ID number:  
 Title of Joint BIP Application:  
 Easygrants ID:

**Other Applications**

Is this application being submitted in coordination with any other application being submitted during this round of funding?

- No

Easygrants ID	Project Title

If YES, please explain any synergies and/or dependencies between this project and any other applications.

**Individual Background Screening**

Is the Applicant exempt from the Department of Commerce requirements regarding individual background screening in connection with any award resulting from this Application?

- No, Applicant is subject to these requirements

If the answer to the above question is "No," please identify each key individual associated with the Applicant who would be required to complete Form CD-346, "Applicant for Funding Assistance," in connection with any award resulting from this Application:

Name	Title	Employer
Allen R. Hoopes	President	Silver Star Communications
Ron B. McCue	Chief Operating Officer	Silver Star Communications
Chad Turner	Vice President/Finance	Silver Star Communications



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## B. Executive Summary, Project Purpose and Benefits

### Essay Question

**Executive Summary of the proposed project:**

Almost the entire state of Wyoming is “rural and remote” with a land area of 97,814 square miles and a 2008 estimated population of 532,668. Wyoming is the ninth largest state in area, but the least populated state of the nation; the entire state has an average of 5.3 people per square mile. Cities, towns and small communities are predominantly distributed across the state with two to three hour drives between population centers of 25,000 to 50,000 people. Wyoming businesses and citizens have by necessity begun to strongly embrace broadband technology to overcome the distance and density factors.

Today, there is an approximate 33 mile gap over the precipitous Teton Pass of Wyoming effectively isolating much of the area from other communications carriers, business entrepreneurs, health care providers, educational facilities and community services. This project would complete an opening in the current fiber network that would connect the project areas into Idaho. The resulting fiber optic ring topology would consist of this project, and existing fiber segments owned by applicant.

When completed, this project will enable robust and diverse (redundant) broadband network opportunities for 11 counties and 26 communities in Wyoming. Some of the cities, towns and small communities along the entire proposed fiber ring topology include Evanston, Cokeville, Afton, Alpine, Freedom, Jackson, and Wilson.

Direct and indirect beneficiaries of a robust and diverse fiber optic broadband network topology include:

- Approximately 366,000 Wyoming residents or almost 70% of the US Census 2008 estimated state population ([www.census.gov/popest/cities/files/SUB-EST2008-56.csv](http://www.census.gov/popest/cities/files/SUB-EST2008-56.csv))



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- The University of Wyoming and five 2-year institutions (community colleges) BYU Idaho and Idaho State University
- 222 Wyoming Public Schools ([https://wdesecure.k12.us/public\\_ed/schools.html](https://wdesecure.k12.us/public_ed/schools.html))
- 42 Participating Facilities (hospitals, community mental health centers and substance abuse clinics) in the Wyoming Tele-health Network (WYOMING TELEHEALTH NETWORK, Proposal to FCC Rural Health Care Pilot Program [www.fcc.gov/cgb/rural/rhcp.html](http://www.fcc.gov/cgb/rural/rhcp.html), Wyoming [Part 1])
- Other providers, telecommunications carriers and adjoining state networks seeking alternate or protected broadband transport and carrier class service routes in and out of Jackson, and the state of Wyoming in general
- Start-up businesses looking for network reliability, existing businesses seeking to expand to other communities or connect offices using less costly, shorter transport and circuit routes.

The project will consist of a robust DWDM and SONET architecture to provide up to 40 lambdas of 2.5 Gb/s capacity in a working/protect configuration and OC-48 down to DS1 services. Silver Star currently maintains an open network policy and through its Internet provider company does not differentiate among applications that traverse our Internet network. Silver Star commits to adhere to the NOFA's non-discrimination and network interconnection obligations if awarded BTOP funds.

Silver Star Telephone Company, Inc., doing business as Silver Star Communications, has over fifty years experience building and operating a widespread, state of the art broadband network. Silver Star has designed, constructed and operated an extensive network consisting of over 396 miles of transport fiber optic cable supporting diverse and redundant DWDM and SONET circuits. Silver Star has personnel with extensive experience in all departments from management, engineering, operations, customer service and finance prepared to implement and operate this proposed project as an integral part of its existing network.



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The proposed project to Deliver Opportunities by Investing in Rural Wyoming Broadband is estimated to result in 69 created or saved jobs.

Industry estimates place the cost of the Jackson, WY to Victor, Idaho Middle Mile Fiber Optic Project at almost 6.3 million dollars.

For more than a decade, telecommunications carriers have tried to justify the costs required to “close the gap.” The costs as estimated are reasonable given the distance, and the fact that the project will traverse the Bridger-Teton National Forest and riparian areas near Grand Teton National Park. ARRA broadband stimulus funding represents an opportunity to construct a critical and long-needed project for the states of Wyoming and Idaho that would not otherwise be constructed due to costs and area remoteness.

**Project purpose:**

This project proposes to complete a fiber optic ring throughout the designated service areas of western Wyoming and, thereby intends to provide a robust broadband network within the proposed funded service area for use by Critical Community Facilities, Community Anchor Institutions, Public Safety entities, Educational Institutions, Internet Service providers, voice and data providers, and for the transport of that traffic both within and outside the state.

The proposed project addresses four of the five key purposes of the national broadband service development and expansion program, as established by the American Recovery and Reinvestment Act:

- 1) The project will enhance the availability and provision of broadband services to underserved households and businesses in western Wyoming communities.
- 2) The project will provide broadband access and support to schools, libraries, medical and health care providers, and will serve to facilitate greater use of broadband services by vulnerable populations within the proposed funded service area.
- 3) The project will serve to improve access to and use of broadband service by public safety agencies within the proposed funding service area including: county sheriff departments, fire



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protection and emergency service, by enhancing the economic viability and availability of high capacity, secure broadband facilities.

4) The project will stimulate the demand for broadband by enhancing its availability, will stimulate economic growth and job creation. This project alone is estimated to create 69 direct jobs and, as a result, foster economic growth and further job creation.

Completion of this project ensures a survivable fiber optic ring upon which 911 emergency services systems and other essential services will be carried continuously, which services will not be rendered inoperable region-wide by a single cut in the fiber system. As shown by the various letters of support, numerous federal state, county and city agencies, health care providers, local businesses and K-12 educational facilities have pledged their support to this proposed project (see Support Letters, attached under Supplemental Information).

Direct and indirect beneficiaries of a robust and diverse (redundant) fiber optic broadband network topology include:

- Approximately 18,251 Wyoming residents within the proposed funded service area
- 8 Wyoming Public Schools
- at least 1 Participating Facilities (hospitals, community mental health centers and substance abuse clinics)
- 3 emergency Facilities

Robust health care and educational opportunities would necessarily include adequate capacity and a redundant, protected, secure facility to transport critical information to and from remote locations to specialized medical facilities and learning centers. This project would create just such a high capacity, redundant and secure broadband facility for use by all of the existing health care facilities, emergency services and public schools located within proposed funded service area.

**Recovery Act and Other Governmental Collaboration:**

This project will provide a robust and diverse fiber optic ring topology that will enhance or complement a number of Wyoming Reinvestment and Recovery funding proposals that have a technology component or require advanced broadband capabilities ([http://wyoming.gov/recovery/Documents/Quick Info/WyomingARRAFundingSummary.pdf](http://wyoming.gov/recovery/Documents/Quick%20Info/WyomingARRAFundingSummary.pdf)).



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Some Key Agencies and announced funding levels in Wyoming include:

- Department of Transportation (\$172 million)
  - o Including enhanced road/weather condition monitoring
- Department of Education (\$162 million)
  - o Including technology upgrades and delivery technology
  - o Statewide connectivity
- Department of Health and Human Services (\$48 million)
  - o Including technology upgrades and delivery technology
  - o State and national connectivity
  - o Rural Health Care Initiatives
- Department of Energy (\$48 million)
  - o Including monitoring and enhanced Energy Assurance (Smartgrid)
- Department of Labor (\$8 million)
  - o Workforce Training (training centers and training delivery)
- Department of Justice (\$6.5 million)
  - o Combatting internet crime initiatives ([www.recovery.gov/?q=content/available-amount-program&state=WY](http://www.recovery.gov/?q=content/available-amount-program&state=WY))

Collaboration opportunities that can create efficiencies and leverage existing stimulus funds exist with:

- Wyoming Department of Transportation and establishment of rights of way corridors
- Assists schools and medical facilities in choosing and deploying technology in a cost effective manner
- Wyoming Workforce training centers connected to a robust statewide fiber network can deliver training services in most communities
  - o Dislocated Worker Assistance
  - o Existing Employee training
  - o Advanced Training for emerging industry sectors

**Fit with BTOP CCI Priorities:**

This project: Delivering Opportunities: Investing in Rural Wyoming Broadband is designed to exceed CCI Priorities, and will consist of a robust DWDM and SONET architecture to provide up to 40 lambdas of 2.5 Gb/s capacity in a working/protect configuration and OC-48 down to DS1 services. When completed, this project will enable robust and diverse (redundant)



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broadband network opportunities for 11 counties and 26 communities in rural, western Wyoming. Direct and indirect beneficiaries of a robust and diverse (redundant) fiber optic broadband network topology include:

- Start-up businesses looking for network reliability, existing businesses seeking to expand to other communities or connect offices using less costly, shorter transport and circuit routes.
- Other providers, telecommunications carriers and adjoining state networks seeking alternate or protected broadband transport and carrier class service routes in and out of Jackson, Wyoming, and the state of Wyoming in general.
- Service area health care providers, educational facilities and community/emergency service providers.

Specifically, Indirect Community Anchor Institution that will benefit from this proposed project include:

Jackson Elementary  
Colter Elementary  
Kelly Elementary  
Moran Elementary  
Summit High School  
Teton County School District  
The Learning Center  
Teton County Library  
Teton County Law Library  
Brent Blue MD  
Central Wyoming Neurosurgery  
Emerg-a-Care  
Gros Ventre OBGYN  
Jackson Whole Family Health  
Orthopaedic Associates of Jackson Hole  
Snake River Orthopedics  
St Johns Medical Center  
Stephen Brown, MD Psychiatric Services  
Teton Orthopaedics  
Teton Pediatrics



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The Women's Health Center& Family Care Clinic  
Theresa Lerch Family Practice OBGYN  
Western Wyoming Family Planning  
Wyoming Medical Group  
Zoe Interventional Pain Management Center  
Jackson Fire Department  
Teton Country Sheriff  
Emergency Management  
Central Wyoming College  
Camp Davis of University of Michigan  
Grand Teton University  
Community Safety Network  
Teton County Government Services  
U.S. Agriculture Services  
Wyoming State Government Offices  
Homeland Security  
National Science Foundation  
National Center for Atmospheric Research  
U.S. Forest Service  
Teton County Landfill  
Teton Country Road & Levee Department  
Central Wy College-Jackson  
University of Wyoming Outreach  
Latino Resource Center  
Job Service Center  
Western Wyoming Dermatology  
US District Court

Region anchor institutions, numerous state agencies, other communications carriers, business entrepreneurs, health care providers, educational facilities and community leaders have identified this proposed project as a high priority. The potential effects of this project have far-reaching socioeconomic benefits, including improved and more affordable broadband access for public and private businesses, learning institutions, medical facilities, and small business owners.

**Is the applicant seeking a waiver of the Buy American provision pursuant to section x.Q of the NOFA?**



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- No

**Is the applicant delinquent on any federal debt?**

- No

If Yes, justification for delinquency:

**Are you seeking a waiver of any requirement set forth in the NOFA that is not mandated by statute or applicable law?**

- No

**Is the applicant a current recipient of a grant or loan from RUS?**

- Yes

## **C. Partners**

**Are you partnering with any other key institutions, organizations, or other entities for this project?**

- No

If YES, key partners are listed below:

--

**Description of the involvement of the partners listed above in the project.**

Delivering Opportunities: Investing in Rural Wyoming Broadband is intended to benefit the communities within the proposed funded service area and, while not formally partnering with entities to construct and manage this proposed project, Applicant expects and intends to deliver improved broadband access to community anchor institutions, area businesses and households.

Potential beneficiaries of this proposed project include the following:

Jackson Elementary  
Colter Elementary  
Kelly Elementary  
Moran Elementary



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Summit High School  
Teton County School District  
The Learning Center  
Teton County Library  
Teton County Law Library  
Brent Blue MD  
Central Wyoming Neurosurgery  
Emerg-a-Care  
Gros Ventre OBGYN  
Jackson Whole Family Health  
Orthopaedic Associates of Jackson Hole  
Snake River Orthopedics  
St Johns Medical Center  
Stephen Brown, MD Psychiatric Services  
Teton Orthopaedics  
Teton Pediatrics  
The Women's Health Center & Family Care Clinic  
Theresa Lerch Family Practice OBGYN  
Western Wyoming Family Planning  
Wyoming Medical Group  
Zoe Interventional Pain Management Center  
Jackson Fire Department  
Teton Country Sheriff  
Emergency Management  
Central Wyoming College  
Camp Davis of University of Michigan  
Grand Teton University  
Community Safety Network  
Teton County Government Services  
U.S. Agriculture Services  
Wyoming State Government Offices  
Homeland Security  
National Science Foundation  
National Center for Atmospheric Research  
U.S. Forest Service



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Teton County Landfill  
Teton Country Road & Levee Department  
Central Wy College-Jackson  
University of Wyoming Outreach  
Latino Resource Center  
Job Service Center  
Western Wyoming Dermatology  
US District Court

## **D. Congressional Districts**

### **Applicant Headquarters**

- Wyoming

### **Project Service States**

Wyoming

### **Project Service Areas**

Wyoming - At Large

**Will any portion of your proposed project serve federally recognized tribal entities?**

- No

**Indicate each federally recognized tribal entity your proposed project will serve.**

**Have you consulted with each of the federally recognized tribal entities identified above?**



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➤ No

## E. Service Area Details

Is the applicant seeking a waiver for providing less than 100% coverage of a service area?

➤ No

### Project Details

**Service Area Type:** Middle Mile  
**Service Area Name:** Jackson to Wilson PFSA  
**Rural Classification of the Last Mile Service Area:** Rural  
**Service Status of the Last Mile Service Area:** Underserved

**If Service Status is "Underserved" please select at least one applicable option from this list.**  
 No fixed or mobile broadband service provider advertises broadband transmission speeds of at least 3 mbps downstream in the proposed funded service area;

**Total Square Miles in Service Area:** 40  
**Total Population in Proposed Service Area:** 18,251  
**Total Number of Households in Service Area:** 10,267  
**Total Number of Businesses in Service Area:** 1,915  
**Total Number of Community Anchor Institutions and Public Safety Entities in Proposed Funded Service Area:** 12  
**Unemployment Rate in the Service Area:** 9  
**Median Income in the Service Area:** 54,614  
**Estimated Percentage of Households with Access to Broadband:** 89  
**Estimated Percentage of Households Subscribing to Broadband:** 64

## F. Community Anchor Summary

Community Anchor Summary	
Schools (k-12)	8



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<b>Libraries</b>	0
<b>Medical and Healthcare Providers</b>	1
<b>Public Safety Entities</b>	3
<b>Community Colleges</b>	0
<b>Public Housing</b>	0
<b>Other Institutions of Higher Education</b>	0
<b>Other Community Support Organization</b>	0
<b>Other Government Facilities</b>	0
<b>TOTAL COMMUNITY ANCHOR INSTITUTIONS</b>	<b>12</b>
<b>Historically Black colleges and Universities</b>	0
<b>Tribal Colleges and Universities</b>	0
<b>Alaska Native Serving Institutions</b>	0
<b>Hispanic Serving Institutions</b>	0
<b>Native Hawaiian Serving Institutions</b>	0
<b>TOTAL MINORITY SERVING INSTITUTIONS</b>	<b>0</b>

## G. Project Benefits

### Demographics



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Jobs	
How many direct jobs-years will be created from this project?	69
How many indirect jobs will be created from this project?	44
How many jobs will be induced from this project?	25

**Methodology used to estimate jobs:**

Applicant used the "Simple Rule for Estimating Job Years Created by Government Spending" methodology suggested by the Council of Economic Advisors to produce project job estimates,

\$92,000 of government spending creates 1 job-year. This project generates \$6,346,571 of government spending, divided by \$92,000 resulting in 68.98 job-years.

64% of the job-years represent direct and indirect effects, and 36% of job-years are induced effects.

Using the job-years number above, 68.98:

multiplied by 64% results in 44.14 indirect jobs

multiplied by 36% results in 24.83 induced jobs

**Project Impact:**

Silver Star Communications provides middle mile services into Teton County, Wyoming. This existing fiber provides services to Qwest Communications, Silver Star Wireless, AT&T Mobility and Lower Valley Energy. Silver Star Communications is also in negotiations with a local MSO to provide transport service. Teton County is in a geographical challenged area due to the physical characteristics and severe winter weather. This fact magnifies the importance of the existing fiber as it is the communication life line to the County. This project will provide an alternate path out of the County that could be utilized to prevent isolation of the County due to a failure in the existing cable. It will also place fiber directly to a High School, Middle School, Elementary School, Private School, Teton Science School, and School for the Disabled. It will provide service to Teton County Search and Rescue and two Fire Stations. Because Qwest is the ILEC for the area the services provided by this project could benefit almost every institution in the County. Along with School Districts, Public Library and Law Library, St. Johns Medical Center, and Central Wyoming College-Jackson, Teton County has a large Federal Government presence in Teton Nation Park Service.



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**Vulnerable Populations:**

No vulnerable population groups are overrepresented in the project’s proposed funded service area.

**Level of Need:**

Teton County WY has been one of the fastest growing counties in the Wyoming due to the scenic, natural value of the area. Teton County WY is home to the Grand Teton Nation Park which also serves as the gateway to the Yellowstone National Park.

Teton County, which includes the Towns of Jackson, Wilson, Moran, and Moose, were served with a microwave system until 2003 when Silver Star Communications through its partners installed a 300 mile DWDM system from Jackson to Evanston (WY) to provide Teton County with a fiber communications link to central Wyoming. This DWDM network has provided great service and reliability to the communication systems of Teton County. This network was constructed using a 30 mile segment of Aerial fiber due to the land space of the route through Snake River Canyon along US Highway 89. Although aerial fiber has greater risk to environmental problems (i.e., lightning, avalanches and physical damage), the Snake River Canyon did not have an adequate build window for installing underground fiber. The Qwest Communications network has grown significantly since the installation of the fiber network, so the original microwave system does not have adequate capacity to serve as a backup to the fiber system.

Teton County WY has a very competitive landscape including multiple mobile voice and mobile broadband services along with multiple fixed wireline high speed internet providers. The mobile voice market includes, Silver Star Wireless, Verizon Wireless, Union Wireless, Sprint-Nextel, T-Mobile, and ATT Mobility. The fixed broadband market includes Bresnan and Qwest Communications. The Jackson market also included one of the nation’s first Mobile 4G WiMax networks and 3G networks from Silver Star Wireless, Verizon Wireless, and ATT Mobility. This competitive market has led to a variety of service and pricing alternatives for the communication users of Teton County, WY.

These competitive services require a reliable network connection with redundant fiber path. A communications network is only as reliable as the worst section. The existing network has operated with only a few short disruptions over the years, but these short disruptions have led to a few communications outages for the Teton County service area.



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Silver Star has considered adding a second path into the Teton County network for multiple years, and feels strongly that such a route would benefit the residents of western Wyoming, it has had to reject the project because of the extreme financial impact on the company. Silver Star as a recipient of USF funds can recover the costs of most fiber extensions when used for regulated network services. However, these recovery methods provide only limited funds to complete projects outside the company network; a majority of the cost recovery methods are essential for Silver Star's continued success and are generally invested back into the company. Silver Star elected not to include the Teton Pass project in its long term plan due to the high cost and financial strain on working capital.

Receipt of BTOP funds would allow Silver Star to complete the proposed project. This project will provide a redundant network path to the Teton County WY communications subscribers. Without grant funds, this project would be impossible due to the high cost of construction within Teton County because of its location to the geographic landscape (and the fact that this project requires crossing the Teton Mountain range at Teton Pass, WY).

Another important element of this project is providing new 1 Gb/s connections to the anchor institutions along the proposed route. This project connects 12 anchor institutions using a non-blocking 1 Gb/s active Ethernet solution. The network being proposed for the anchor institutions will provide the bandwidth as recommended by the newly released FCC National Broadband Plan. The anchor institutions will be provided with connections that meet the short term and long term requirements. Eight out of the 12 anchor institutions are education providers, and providing 1 Gb/s connections will allow students adequate internet connections for our future connected students.

The project will perform multiple long term goals that fit into the Broadband Stimulus program and national broadband plan including 1 Gb/s connections to Anchor institutions, redundant connections reliability and economic stimulation through direct spending within the Teton County area.

## **H. Technology**

<b>Technology Type</b>
------------------------

**Indicate the technology that will be used to deliver last mile services. The following items were selected:**

Wireline - Fiber-optic Cable



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Other:

**Technology Questions**

**Methodology for Area Status:**

Applicant has determined the area status as "underserved" according to the definition contained in the NOFA at Section III: 'Underserved area means ... a Middle Mile service area, where at least one of the following factors is met: ... (ii) no fixed or mobile terrestrial broadband service provider advertises to residential end users broadband transmission speeds of at least three megabits per second ("Mbps") downstream in the .... Middle Mile service area.'

This middle mile project includes at least some portion of the project inside a served area; an underserved area cannot be connected to a served area without going into an area that is classified as "served". This project includes 51% of the route miles in "underserved" areas. Applicant is aware of no advertisements that are being made within the proposed underserved area that have qualified the area as served; therefore by definition, the area status is "underserved."

**Description of Network Openness:**

Applicant plans to offer interconnection to the proposed funded project on a non-discriminatory basis just as it does for its existing network. These interconnections will be offered on a competitive, non-discriminatory basis to carriers and access providers in sound financial condition and in good standing with federal, state and local regulatory agencies. Master Service Agreements (MSA's) will be on file with all carriers who interconnect, whether through private line circuits, Ethernet services, or Dedicated Internet Access (DIA). These MSA's will define the terms, conditions and service assurance levels under which the interconnection services will be offered.

Applicant will deploy a network monitoring and alarm aggregation system that monitors individual network elements (from SONET/DWDM Nodes to Network Routers and Switches) in real time to assure the highest level of service, a proactive approach to network degradation and a prompt response to network outages. For customers who subscribe to broadband and DIA services, Applicant will establish an Acceptable Use Policy (AUP) that will be published on its



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website. This AUP will define the terms and use of the Internet and broadband access services provided by Applicant as well as the consequences for default on the part of the subscribing party.

Applicant will employ the services of a Trusted Third Party and will be in compliance with the Communications Assistance for Law Enforcement Act (CALEA) for packet networks and will file annually its compliance with the Federal Communications Commission.

Applicant intends to fully comply with the “Nondiscrimination and Interconnection” provision of the NOFA and understands that failure to comply will be considered a default of any loan or grant agreement that may be offered.

**System Design:**

The network being proposed for this project is a hierarchical design that includes middle mile access equipment and long haul transport equipment over a fiber core. The network starts at the existing facilities of Silver Star Telephone Company. Silver Star currently has a fiber network that extends to the Rafter J (Jackson) Hut using Aerial fiber from Alpine WY. Silver Star through its partners extends this network down to Evanston WY.

The physical fiber cable proposed in this project will be installed along US-89 from Silver Star's Rafter J hut to High School Road, then be extended to connect the anchor institutions of Jackson High School, Jackson Hole Community School, Jackson Hole Christian Academy, Jackson Hole Middle School, and Colter’s Elementary School, located on the outskirts of Jackson, WY. The second section of the fiber will extend from the Jackson Middle School along South Park Loop to the intersection of WY-22 and US-89. The fiber will continue down WY-22 picking up Anchor Institutions Teton Search and Rescue and Teton Science School before terminating at the junction of WY-22 and WY-390. The primary route of the fiber network will extend from along WY-22 to Teton Pass communications site, and then proceed down to the meet point with Columbine Telephone Company. A secondary leg will extend fiber from WY-22 and WY-390 to the C Bar V Ranch School for the Disabled.

The fiber optic cable proposed for this project will be Applicant's standard size for transport of 96 fibers. History and experience has shown us that a 96 fiber provides a very good balance between installation cost and future requirements.



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The top level transport electronics in this hierarchical design includes an extension of the Silver Star DWDM network from the Rafter J (Jackson) Hut to Teton Pass, then to the Victor ID central office. This DWDM network will complete the redundant path from Teton County WY to the Silver Star Internet point of meet in Iona, ID. This DWDM network will be equipped with OC-48 optics for the initial second level transport system, but will have capacity to be upgraded up to 40 lambdas each with a capacity of at least 10 Gb/s. The upgrade to 40 Lambda will require additional shelves at the regeneration and uplink sites. The additional shelves will be purchased by Silver Star as required to fulfill circuit requests and needs. The DWDM network will allow Silver Star to sell lambda based services from the Point of Meet to Jackson WY.

The second layer of transport is for SONET type services for low-level circuits from DS1s to OC-12s. This SONET system will originate in the Rafter J Hut, then it will have an add drop location at Teton Pass, and proceed into Victor ID. This SONET network will only require low cost short range optics because it will be transported on the DWDM network. Connecting to the DWDM network will allow additional protection, because the DWDM network will have the ability to reroute optical lambdas in a fiber cut emergency. The Teton Pass SONET location will be the only new physical location required for the low level transport.

The third level in the network equipment is the middle mile access equipment. The access network will be located in the existing Rafter J hut with direct fiber connections to each of the anchor institutions. Each of the Anchor Institutions will be provided a direct 1 Gb/s FTTB connection. The connection from the Rafter J access equipment to Silver Star's Internet point of meet in IONA, ID will be a 1 Gb/s connection with redundant paths over the existing fiber and the new proposed fiber. The IONA Hut is also the interconnection points with tier 2 national internet providers and the national MPLS providers.

Silver Star has selected DWDM as the primary transport equipment because of its capacities for future upgrades and our company's history with using this type of equipment. The DWDM electronics proposed will provide capacity for serve Teton County for the next 20 to 30 years. The DWDM equipment proposed can also be upgraded to 40 Gb/s or 100 Gb/s per Lambda and also upgrade to support 40 additional Lambdas. DWDM network has been Silver Star's primary transport service because of its scalability for multiple years; extending this DWDM network over Teton Pass makes engineering and financial sense.



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The middle mile aggregation network is being proposed as an Active Ethernet network. An Active Ethernet network will provide 1 to 2 dedicated fibers to each Anchor institution. These dedicated fibers will be activated with 1 Gb/s electronics. If any Anchor Institution grows beyond the initial 1G/s capacity the subscriber electronics can be upgraded to 10 Gb/s electronics without changing any physical fiber optic in the ground.

**Is the applicant seeking a waiver pursuant to section IX.C of the NOFA so as to sell or lease portions of the award-funded broadband facilities during their life?**

No

## I. Project Budget

Project Budget		
	Federal Grant Request	Match
Last Mile	0	0
Middle Mile	5,063,623	1,282,948
<b>Total</b>	<b>5,063,623</b>	<b>1,282,948</b>

**Project Budget Total:** \$6,346,571

**Match Percent:** 20.2%

**Projects Outside Recommended Funding Range:**



Outside Leverage	
<b>Applicant is providing matching funds of at least 20% towards the total eligible project costs?</b>	Yes
<b>Matching cost detail</b>	The following breakdown details Applicant's in-kind and cash match contributions to the total project costs. The specified in-kind contributions meet the definitions contained in Section V.E.2.a, are necessary to the success of the project and include the labor/services



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	<p>of Applicant's experienced staff in the engineering, construction, administration and management of the proposed project. Applicant's in-kind and cash match contributions equal 20.22% of the total project costs.</p> <p>Administrative and legal expenses - \$20,000 (in-kind) (Applicant internal staff labor/services)</p> <p>Architectural and engineering fees - \$67,050 (cash) and \$324,200 (in-kind) (Applicant internal staff labor/services for design, project compliance and \$75,000 for application costs)</p> <p>Other architectural and engineering fees - \$9,400 (in-kind) (Applicant internal staff labor/services)</p> <p>Project inspection fees - \$304,800 (in-kind) (Applicant internal staff and contractor labor/services)</p> <p>Construction - \$104,717 (cash) (Contractor fiber splicing services)</p> <p>Equipment - \$424,781 (cash) and \$28,000 (in-kind) (Equipment purchase cost and cost for commercial power to equipment hut; Applicant internal staff labor/services)</p> <p>(See CCI Detailed Budget Attachment for additional documentation.)</p>
<b>Unjust enrichment</b>	Silver Star Telephone Company, Inc. currently is not receiving, nor has it requested to receive, Federal support for non-recurring costs in the service area covered by the proposed project.
<b>Disclosure of federal and/or state funding sources</b>	Silver Star Telephone Company, Inc. currently is not receiving, has not received, nor has it requested to receive, Federal or State funding for this proposed project.



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<b>Budget reasonableness</b>	<p>The route Applicant has designated for the proposed project is the most cost effective based on distance, construction cost and potential environmental impact. The total number of units indicated for each budget category is based on over fifty years of communications industry experience and industry standards for design. The unit price indicated is based in part on current estimates provided by vendors and in part on Applicant's experience with projects of this magnitude.</p> <p>Budgeted network equipment costs of \$398,618 are based on the most recent quote available from the DWDM/SONET vendors plus anticipated in-house support costs.</p> <p>The proposed cable route is 33 miles. The OSP design is two (2) 1.25 inch diameter plowcon ducts, direct buried. Fiber optic cable ranging in size from 288 count to 96 count will be installed (jetted) in one of the ducts; the other duct will be spare. 100 foot of fiber coil has been allocated at each handhole. Miscellaneous materials include fiber vaults/handholes, splice cases, duct couplings, warning tape, etc. Multiple crews working this project will be necessary in order to complete it within the limited construction seasons available using standard construction support equipment (backhoes, trackhoes, directional boring equipment, fuel truck) to obtain the DOT required bury depth of 48 inches through the rocky terrain typical of the service area. A significant amount of rock-saw operation will be required to place the buried cable along this mountain route. The budgeted OSP construction cost of \$5,168,340 is reasonable for the geography and difficult geology of the area in which the project lies.</p> <p>Engineering costs of \$68,7800 include design, staking, mapping, and clerical services. Costs are based on recent experience with the design of similar projects. An additional \$55,000 is estimated to complete the NEPA compliance requirements based on an estimate provided by a qualified Environmental firm with experience in the local area.</p> <p>Project management costs of \$439,800 include project coordination,</p>
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	inspection and compliance work. Costs are based on recent work performed and the requirements of this program.
<b>Demonstration of need</b>	<p>This middle mile project constructs approximately 33 miles of fiber facilities between Jackson, WY and the Wyoming/Idaho stateline at Victor, ID to complete an existing 149 mile regional fiber network. Completing this fiber ring will enable robust, redundant broadband network opportunities for 11 counties and 26 communities in western Wyoming.</p> <p>This project is estimated at \$6.3 million, of which no capital funding is available from or committed by other federal or non-federal sources. Beyond in-kind contributions with which Silver Star intends to support this proposed project, no outside funds have been solicited. Silver Star's current transport network serves as the main transport network for Teton County and affects most of the households in surrounding areas that subscribe to Broadband Internet services from wired providers. Challenges associated with building this project include the rocky terrain and high mountain weather patterns that restrict underground construction during 6-7 months of the year.</p> <p>For more than a decade, telecommunications carriers have tried to justify the costs required to close the gap. The estimated project costs are reasonable given the distance, and the fact that the project will traverse difficult construction and cable plowing terrain such as dormant lava flows. ARRA broadband stimulus funding represents an opportunity to construct a critical and long-needed project for the state of Wyoming that might not otherwise be constructed due to costs and area remoteness.</p> <p>Silver Star, by itself, is unable to fund a \$6.3 million project, given current capital requirements to maintain and improve its existing network. A capital intensive project such as the one proposed requires an immediate outlay of cash. Silver Star is in the process of replacing depreciated equipment and upgrading obsolete technology within its existing service territory for the benefit of its existing customers.</p>



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	<p>Lending resources have been exhausted due to the large capital outlays toward current projects. As demonstrated by the Cash Flow forecast, it would be difficult-if not impossible-for Silver Star to fund a capital intensive project such as the one proposed. While Silver Star currently is working to improve the status of debt covenants in the short term, it anticipates over the next couple of years to be in a better position to again seek outside federal or non-federal funding sources as a large amount of the current obligations will be paid down. The proposed project would not be possible during the grant period without the federal grant assistance.</p> <p>An award of ARRA funds would resolve the dilemma Silver Star faces in being unable to justify the cost of closing the gap, while supporting the ARRA and BTOP priorities by enhancing rural broadband facilities and by stimulating local economic growth through jobs and development of key area facilities.</p>
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**Funds to States/Territories**

States	Amount of Federal Grant Request
Wyoming	

**Funds to States/Territories Total:** \$5,063,623

## J. Historical Financials

Matching Funds			
	2007	2008	2009
Revenue	██████████	██████████	██████████
Expenditures	██████████	██████████	██████████
Net Assets	██████████	██████████	██████████



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<b>Change in Net Assets from Prior Year</b>	██████████	██████████	██████████
<b>Bond Rating (if applicable)</b>			

## K. Project Readiness

### BTOP Organizational Readiness

Silver Star Telephone Company, Inc. operates a mission critical service, which requires detailed work-flow procedures. Silver Star is keenly aware that proper work-flow procedures are necessary to ensure timely delivery of services to its customers. Silver Star has in place a Work Flow Procedural Manual establishing appropriate documentation, notification, training and billing procedures. All services that Silver Star provides follow the applicable procedure. The overriding goal of the Procedural Manual is to provide a high level of service to the customer, along with detailing every work flow process that occurs from start to finish on a customer order. Periodic changes are made to the work-flow process to increase the efficiency of the organization.

Organization Departmental roles and responsibilities are described below:

**Sales:** The sales process is initiated by a potential customer contacting a Silver Star sales representative. Sales representatives have two customers: customers and Silver Star sales support personnel. The primary role of the Silver Star sales representative is to ask the appropriate questions and analyze the customer's need. The secondary role is to give all required information to the sales support personnel who in turn will create a quote(s) or service orders.

**Operations Engineering:** The role of Operations Engineering is to monitor the network and the equipment for the network. Operations Engineering is responsible for keeping an updated inventory of anything related to the network. Operations Engineering is also responsible for performing verification of network capacity for quotes.

**Provisioning:** The role of provisioning staff is to provision circuits on the network, process paperwork to 3rd party vendors for all orders, and designate assignments for orders.



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**Network Operations:** Network Operations is the technical group responsible for physically wiring and connecting the circuits and for troubleshooting, testing all circuits with other vendors.

**Accounting:** Accounting is responsible for keeping accurate billing records for all customers, collecting payment from customers, and analyzing 3rd party bills. Accounting is also in charge of ensuring federal grant and loan funds are utilized in a fiscally responsible manner.

Silver Star has over fifty years' experience building and operating a widespread, state of the art broadband network, having designed, constructed and operating a robust network consisting of over 396 miles of transport fiber optic cable supporting diverse and redundant DWDM and SONET circuits. As detailed above, Silver Star has the necessary organizational mechanisms in place and the personnel with extensive experience on staff in all departments prepared to implement and operate this proposed project.

**Construction and Vendor Contracts**

Applicant anticipates using vendors and/or contractors for the following activities associated with the proposed project. Copies of vendor support are uploaded in the supplemental information attachment.

Engineering (Preliminary Design, Budget estimates, staking, rights-of-way, bids, contracts and closeouts, construction inspection services, mapping, project compliance)

- In-house 100%

Environmental Documentation

- Consulting Firm 90%
- In-house 10%

Construction

- Outside Contractor (by bid) 100%
- In house fiber splicing 100%

DWDM & SONET EQUIPMENT Equipment (Purchase & Installation)

- In-house 100% (Vendor already providing similar equipment in other parts of existing network under existing contract).
- In-house installation and support – 100%



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Outside Plant Material (fiber, conduit, vaults/handholes, misc)

- Provided by contractor or vendors – 100%

**Customer Base**

At the present time Silver Star has no direct landline customers in the proposed service area. Silver Star is the middle mile provider for Qwest Communications who is the ILEC for the area. Applicant also provides service for Silver Star Wireless and AT&T Mobility.

The proposed project will directly link Fiber Optic Cable to eight Schools, one Public Health Provider and three Public Safety Entities. This project will provide the opportunity for the existing last mile providers in Teton County Wyoming, i.e., Qwest Communications, Bresnan Communications and any Public or Government entities the option of a survivable fiber ring.

Residential and Business subscribers today are provided service through the last mile providers of Qwest, Bresnan, Silver Star Wireless and other mobile providers. All existing services that are carried via fiber into Teton County Wyoming are on an existing Silver Star fiber cable.

Research indicates there are potential customers in the Proposed Funded Service Area:

Residential 10,267

Businesses 1,915

Community Anchors 11

A substantial number of additional residential, business and Community Anchor Institutes located within Teton County but outside the Proposed Funded Service Area may also benefit from this project.

**Licenses, Regulatory Approvals and Agreements**

The following agencies and entities are identified as requiring notifications, regulatory approvals, licenses or permits and right-of-way agreements.

1. Wyoming Department of Transportation Right of Encroachment Permit
2. Teton County Wyoming – Application and Agreement For Trenching and Utility Installation - Installation in County Road Right-of-Way and on County Bridge Structures.



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3. City of Wilson, Wyoming – Encroachment ( Right-Of-Way) – Permit for Utilities
4. City of Jackson, Wyoming – Encroachment ( Right- Of-Way) – Permit for Utilities
5. US Forest Service – Teton National Forest – Road Permit
6. US Forest Service –Targhee National Forest – Road Permit
7. U.S. Army Corp of Engineers – Waterway Encroachment
8. Lease agreement with Columbine Telephone for circuits and from Idaho/Wyoming State Line to Victor, Idaho Central Office.
9. Lease agreement with Columbine Telephone for space to place electronic equipment in Victor, Idaho Central Office.

Informal visits and inquiries have started. No formal regulatory review, license applications or right-of-way permitting has started.

**SPIN Number**

## **L. Environmental Questionnaire**

### **Project Description**

The Delivering Opportunities: Investing in Rural Wyoming Broadband project is a middle mile project including 32.6 miles of buried fiber optic cable with handholds between Silver Star’s existing Rafter J terminal office located south of Jackson WY US Highway 89 and a point of interconnection at the Wyoming/Idaho border on State Highway 22. The proposed route will follow US Highway 89/191 in south Jackson to High School Road, then to South Park Loop, back to Highway 89 and west on Highway 22 over Teton Pass to the Wyoming border with Idaho.

Silver Star will lease existing fiber capacity from Columbine Telephone Company in Idaho between the Wyoming/Idaho border and its existing Victor Central Office. Two 1.25” conduits will be placed in the previously disturbed right-of-way with a fiber optic cable installed inside one conduit, leaving the second conduit for future use. DWDM & SONET transport equipment will be installed in existing rack space in existing buildings under this project to provide for



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interconnection with other service providers at both ends of this project as well as at the mid-point which is the existing Teton Pass Communications site located on USFS property and managed by Silver Star. (See Network Maps, attached, for the project route.)

**Property Changes**

The proposed project will be located in Teton County, WY and Wyoming DOT Right-of-Way along U.S. Highway 89 and State Highway 22, as well as Town of Jackson secondary roads in the vicinity of the High School and Elementary School.

Teton County and Town of Jackson properties surround the route from the south point at 4000 S Hwy 89 to the western limits of the Town of Jackson at approximately 7000 W Hwy 22. Bridger Teton National Forest lands surround the remainder of the route to the Wyoming/Idaho border.

The entire 32.6 mile route located in State and County right-of-way will be temporarily disturbed to a width of up to 40 feet during construction by cable plows, small backhoes, boring equipment and rocksawing equipment as needed. The current land use is Wyoming State highways and Teton County Wyoming roads.

Underlying ownership of the land in the National Forest is the USFS, while Wyoming Department of Transportation is the permitting agency. Zoning in the Town of Jackson portion includes Public/Semi-public, Res-Bus, and NC-PUD. Zoning along the County portion of the highway route includes Rural, Single Family, PUD, Park, Suburban, and Public/Semi-public.

**Buildings**

No buildings or structures will be constructed for this project. The proposed project will be located entirely within previously disturbed public rights-of-way in the form of buried cable and conduit with handholds that project up to 6” above the ground, spaced as needed.

**Wetlands**

Based on a NWI search, there are three main wetland areas along the route. Most of the wetlands and waterway crossings are between Rafter J subdivision and Wilson, WY. A detailed delineation will be conducted and a Nationwide 12 Permit will be obtained as appropriate and necessary. In compliance with the Clean Water Act, construction will be done in accordance with the procedures and techniques provided in the direction of the Nationwide Permit program



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regarding wetlands as administered by the USACOE. Three main waterway crossings are necessary for this linear project: one each at the Snake River, Flat Creek, and Fish Creek. The utility crossing of all three rivers will be by connection to the existing bridge structures. (See attachment Wetland document with route.)

**Critical Habitats**

U.S. Fish and Wildlife Service list the Bald Eagle (in recovery), the Yellow-billed Cuckoo (candidate), the Grizzly Bear (threatened), Gray Wolf (experimental) and Canada Lynx (threatened) as known to occur in Teton County Wyoming. Canada Lynx, Grizzly bear, Gray Wolf and Bald Eagle all have habitat in the northwest Wyoming Rocky Mountain region, which includes the project area.

This project will have minimal indirect affects on threatened and endangered species its habitat during the construction progress. Because the construction will be contained within the existing State and County highway rights-of-way, the effect on the Canada Lynx, Bald Eagle, Grizzly Bear and Gray Wolf and habitats will be little more than the current levels of traffic and noise, and will be temporary in nature, occurring over two summer construction seasons lasting approximately seven months each.

The database of the USF&W Service was queried regarding plants and other species as well. The disturbed roadside habitats do not lend themselves to providing habitat for any of the flora listed within the area of interest. (See attachment Critical Habitat for Species Lists and Reports for Teton County, Wyoming.)

**Floodplain**

Three main waterway crossings and crossings of the associated flood plain are necessary for this linear project; one each at the Snake River, Flat Creek, and Fish Creek. The utility crossing of all three rivers will be by connection to the existing bridge structures. (See Attachment Floodplain.)

**Protected Land**

Applicant contacted Mr. Richard Currit, Senior Archaeologist and Review and Federal Consultation NEPA Coordinator of the Wyoming State Historic Preservation Office (SHPO) regarding protected lands along the designated route. Mr. Currit noted that because the proposed



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project is within existing highway rights-of-way already disturbed, the SHPO would likely respond with no concerns involving cultural resources within the construction area of the proposed project. However such response must be a formal response, upon receipt and review of the project description where the SHPO can respond only directly to the agency proposing to permit the project or its officially designated assignee. An official response from SHPO would be under all categories of NEPA including a Categorical Exclusion, Environmental Assessment, or other form of compliance with NEPA. Upon review of the proposed route, the applicant has determined that no new disturbance outside of the existing right-of-way would be required and that there is a very low likelihood that any adverse impacts to cultural resources would result as there are no registered sites within the proposed project area. The project does not traverse any registered tribal lands therefore no impact to such lands is anticipated and no contact with a Tribal Historic Preservation Officer by the applicant will be necessary.

Applicant proposes to facilitate a letter from the permitting agency to the SHPO in order to complete this requirement.

**Coastal Area**

Applicant’s review of the National Oceanic and Atmospheric Administration, Office of Ocean and Coastal Resource Management’s website confirms the project is NOT located within the boundaries of a coastal zone management area.

**Brownfield**

The proposed project is NOT located within a brownfield site as indicated on the U.S. EPA Cleanups in My Community website.



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**Uploads**

The following pages contain the following uploads provided by the applicant:

Upload Name	File Name	Uploaded By	Uploaded Date
Service Offerings and Competitor Data	TP_CCI Service Offerings and Competitor Data Attachment rev1.xls	Hoopes, Allen	03/25/2010
Network Diagram	Network Diagram.pdf	Hoopes, Allen	03/24/2010
Build Out Timeline	TPCCI Build-Out Timeline Attachment.doc	Hoopes, Allen	03/24/2010
List of Community Anchors and Points of Interest	TP_CCI Anchor Detail and POI Attachment.xls	Hoopes, Allen	03/24/2010
Management Team Resumes and Organization Chart	SSTCI-7080 OrgInfo.pdf	Hoopes, Allen	03/24/2010
Government and Key Partnerships	Govt&Key Support.pdf	Hoopes, Allen	03/24/2010
Historical Financial Statements	SSTCI-7080 Financial Statements.pdf	Hoopes, Allen	03/23/2010
Budget Narrative	Budget Narrative.pdf	Hoopes, Allen	03/24/2010



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Detailed Budget	TPCCI Detailed Budget Attachment.xls	Hoopes, Allen	03/24/2010
Pro-forma Forecast	CCI Pro Forma Financial Projections Attachment Teton Pass.xlsx	Hoopes, Allen	03/24/2010
Subscriber Estimates	TP_CCI Subscriber Estimates Attachment.xls	Hoopes, Allen	03/24/2010
Dashboard Metrics	Key Metrics Dashboard.doc	Hoopes, Allen	03/24/2010
Service Area Data	CCI Service Areas Attachment.xls	Hoopes, Allen	03/24/2010
Network Maps	Network Map.pdf	Hoopes, Allen	03/24/2010
BTOP Certifications	Certification.pdf	Hoopes, Allen	03/25/2010
SF-424 C and D	TP_CCI SF 424 C and D FormsRev1.pdf	Hoopes, Allen	03/24/2010
Supplemental Information	Exhibits-Attachments_Supplemental.pdf	Hoopes, Allen	03/24/2010