

DUBOIS TELEPHONE EXCHANGE INC.

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December 1, 2011



Comments of Dubois Telephone Exchange, Inc.
Lander Draft Resource Management Plan & EIS
Bureau of Land Management

RE: CenturyLink Whiskey Mountain Microwave Microwave Site

Introduction

Dubois Telephone Exchange, Inc. (DTE) is an Incumbent Local Exchange Carrier (ILEC) providing voice and advanced communications services to two exchanges (Dubois and Crowheart) in Northwest Fremont County. DTE has been in operation since the 1930s. DTE is a recognized and certificated ILEC by both the Federal Communications Commission and the Wyoming Public Service Commission.

Until 2005, DTE's only communications link to the outside world was via digital microwave radio connecting to the CenturyLink Whiskey Mountain Microwave Radio Site. In 2006, DTE completed a fiber optic facility from Casper to Dubois. This fiber optic facility allowed advanced services such as broadband to be offered to DTE subscribers. However, the fiber optic facility terminates in Dubois. Protection or diverse routing for voice services, signaling and E911 or county-wide EMS is accomplished using the existing digital microwave arrangement with CenturyLink. The existing microwave radio route from Dubois to the Whiskey Mountain microwave site carries identified critical circuits and a limited number of voice circuits from Dubois to the world. This diversity arrangement assures that the Dubois and Crowheart exchanges are not isolated in the event of a fiber optic cable cut.

Wildlife and Motorized Access

I understand the needs of the BLM to manage critical Big Horn Sheep habitat **for the sheep**. I am very familiar with the area that the CenturyLink communications site currently occupies. Over the last 30 + years I have had numerous opportunities to hike to the site, participating in Christmas bird count or photographing. I have spent time on the lee side (out of the wind) of the facility observing sheep courtship rituals or just watching sheep. The sheep do not seem to be disturbed by my careful presence or the communications facility. However I do understand how unfettered motor vehicle traffic would be a more critical disturbance. Locally, I have heard stories of folks driving up the "closed" access road on ATVs, motorcycles and 4WD vehicles to go watch the sheep. Regardless of the final management direction, a greater enforcement presence would help to lessen impacts from present and future unauthorized motor vehicle use and disturbance.

Options for Management of CenturyLink Whiskey Mountain Communications Site

Elimination of the Communications site. Elimination of the site in the next 5 years could jeopardize DTE's ability to provide diversity or protection for critical voice, data, signaling and EMS circuits serving Dubois and Crowheart in the event of a fiber optic cable failure.

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Move the communications site to another location. DTE's primary concern with this option is financial. DTE is a small ILEC with limited annual revenue. Should CenturyLink be required to move their microwave radio site in the next couple years, DTE would incur costs in order to remain compatible with CenturyLink. Expenditure of funds [that DTE does not have] on a legacy communications platform does not make sound fiscal or business sense.

Extension of CenturyLink Authorization for a period of time. Although I cannot speak to CenturyLink's preferences, this option would make the most sense to me. DTE, CenturyLink and other Wyoming telecommunications providers have been studying the options of building fiber optic facilities over Togwotee Pass for a number of years. Notwithstanding the terrain challenges and costs of such a project, a business case must also be made. DTE believes fiber optic facilities will be available over Togwotee within 5 years. Completion of a fiber optic route between Jackson and Togwotee Pass will potentially create a large fiber optic "ring" serving approximately 2/3 the state of Wyoming. Such a network provides opportunities to protect all network traffic (voice, broadband, signaling, EMS, etc) using diverse routing techniques inherent in a fiber optic "ring". When such a "ring" becomes available, operational and reliable, then perhaps the Whiskey Mountain Microwave Radio site will no longer be as critical as it is today.

An option granting CenturyLink a five or ten year extension of their Whiskey Mountain communications site permit; with a biennial review of "new technology" options and a site visit transportation management plan seems to be the least disruptive management decision to existing critical communications infrastructure serving northwest Fremont County and a majority of Teton county.



Michael J Kenney
General Manager