



Board of County Commissioners
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Craig, CO 81625

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Federal Communications Commission
455 12th Street, SW
Washington, DC 20554

Attn: Secretary Marlene Dortch

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FCC Mailroom





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Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
FEDERAL COMMUNICATIONS COMMISSION
455 12th Street, SW
Washington, DC 20554

April 28, 2020

RE: Response to Zirkel Wireless Challenge to Eligible Census Blocks
WC Docket No. 19-126, Rural Digital Opportunity Fund

Dear Secretary Dortch,

It has come to our attention that Zirkel Wireless has submitted a challenge to the preliminary list and map of eligible areas for the Rural Digital Opportunity Fund (RDOF) Phase 1 Auction (Auction 904) (WC Docket No. 19-126). In this challenge, Zirkel Wireless has asked the FCC to remove 545 census blocks in Northwest Colorado from the RDOF auction, which includes the removal of 100% of the blocks in Moffat County.

Moffat County urgently needs reliable, robust, and affordable broadband and voice services. Due to the recent announcements from Tri-State Generation and Transmission Association of its plan to close its power plant in Craig, Colorado, and the subsequent impending closure of the three coal mines in this region, providing stability to the rural and remote citizens of Moffat County, Colorado is more important than ever. The economic impact of these closures is devastating and deploying broadband to our coal impacted communities is one of our County's solutions to stemming the tide of this economic blow. As we seek to diversify our economy, robust broadband services are essential. Any new businesses coming to Moffat County are likely to require high quality broadband and voice services, and it will enhance the possibility of businesses relocating to our county if such services are available here.

We strongly urge the FCC not to remove these blocks from the RDOF auction. Doing so would remove an estimated 13 million dollars in needed funding from Moffat County – a county that needs funding for broadband more than ever. It is necessary for the communities we serve that these blocks remain open for bidding, as they are not currently receiving the 25/3 Mbps broadband and VoIP service designated as a requirement for removal from this auction. Further, the communities included in these blocks will need this service to engage in the future of our economy.

The future of Northwest Colorado depends on these blocks remaining in the FCC RDOF auction. These areas are not currently served with reliable broadband and Zirkel's inaccurate representations should not prohibit these areas from participating in this auction for reliable services. Therefore, we implore the FCC to leave the blocks challenged by Zirkel Wireless in the Rural Digital Opportunity Fund, which is designed to serve the persistently unserved rural citizens of our nation.

Sincerely,

Ray Beck, Chairman

Don Cook, Commissioner

Donald Broom, Commissioner

BOARD OF COUNTY COMMISSIONERS

221 W. Victory Way, Ste. 130
Craig, CO 81625
(970) 824-5517

Don Cook
District 1

Ray Beck
District 2

Donald Broom
District 3