

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Petition of AT&T Ohio)	
Seeking To Relinquish Its Eligible)	Case No. 17-1948-TP-UNC
Telecommunications Carrier Designation in a)	
Portion of its Service Territory.)	

**COMMENTS OF AMERICAN BROADBAND & TELECOMMUNICATIONS IN
RESPONSE TO JUNE 28, 2018 ORDER**

(“American Broadband & Telecommunications” or the “Company”) files these Comments in response to the Commission’s June 28, 2018 Order directing American Broadband & Telecommunications to submit comments regarding its willingness and ability to ensure that all customers served by AT&T Ohio (“AT&T”) in its respective service areas will continue to be served with the federal Lifeline discount if the customer is eligible.

American Broadband & Telecommunications was originally granted ETC status by the Commission on August 22, 201 throughout the service areas approved in Case No. 12-1714-TP-UNC.

It is American Broadband & Telecommunications intent to continue to make available its wireless Lifeline service with the federal discount to its current subscribers and all qualifying applicants that it is able to serve. As has been disclosed in its original application, American Broadband & Telecommunications offers Lifeline service primarily through the resale of facilities-based wireless carriers’ services and facilities. This Commission is aware that the Federal Communications Commission (“FCC”) is considering whether to disallow the

participation of wireless resellers in the Lifeline program altogether.¹ American Broadband & Telecommunications appreciates that this Commission filed comments with the FCC on February 21, 2018 in the pending NPRM to urge the FCC to maintain the forbearance of the facilities requirement.² As this Commission noted, to rescind the facilities forbearance “would...harm the most vulnerable of customers and cause a significant market disruption.”³ American Broadband & Telecommunications, through its participation in the National Lifeline Association, has also actively opposed this and other proposals in the NPRM that would greatly impede American Broadband & Telecommunications ability to continue to provide Lifeline service.⁴

With that in mind, American Broadband & Telecommunications intends to continue to offer Lifeline service to qualifying subscribers throughout its service territory in Ohio unless prohibited directly from doing so by the FCC when it issues its order or unless the FCC rulemaking results in less-direct but equally harmful requirements such as its consideration of a requirement that wireless resellers pass 100% of federal support through to its underlying facilities-based provider. Once the FCC issues its decision in this matter, should anything necessitate a change in American Broadband & Telecommunications approach to the Ohio Lifeline marketplace, American Broadband & Telecommunications will inform the Commission.

¹ See Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, WC Docket Nos. 17-287, 11-42, 09-197, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155 (rel. Dec. 1, 2017), §§ 67 - 73.

² See Comments of The Public Utilities Commission of Ohio, WC Docket No. 17-287 et al. (filed Feb. 21, 2018).

³ *Id.* at 6.

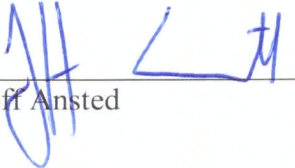
⁴ See Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Feb. 21, 2018); Reply Comments of the National Lifeline Association, WC Docket No. 17-287 et al. (filed Mar. 23, 2018); *Ex Parte* Letter from John J. Heitmann, Counsel to the National Lifeline Association, to Marlene Dortch, Secretary, Federal Communications Commission, WC Docket No. 17-287 et al. (filed May 4, 2018).

Based on the foregoing, American Broadband & Telecommunications stands ready to offer its wireless Lifeline service options to eligible Lifeline subscribers in Ohio provided that the FCC does not take action to ban or limit the participation of wireless resellers in the Lifeline program.

Please feel free to contact me if you wish to discuss this matter further or have any questions.

Respectfully submitted,

American Broadband & Telecommunications

By: 
Jeff Ansted

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Summary: Comments Comments of American Broadband & Telecommunications in response to June 28,2018 order electronically filed by Mr. Jeffrey S Ansted on behalf of Ansted, Jeffrey S Mr. and American Broadband & Telecommunications and Mr. Jeffrey Ansted