

November 30, 2018

Public Utilities Commission of Ohio
ATTN: Docketing Division
180 East Broad Street
Columbus, OH 43215

RE: W.A.T.C.H. TV Company REVISED ETC designation request -- Case 18-1555-TP-UNC

Commissioners,

Please find enclosed W.A.T.C.H. TV Company's Revised Pages 6 & 7 of their
Eligible Telecommunications Carrier (ETC) designation request for the State of Ohio.

Please direct inquiries regarding W.A.T.C.H. TV Company's petition to:

W.A.T.C.H. TV Company
Ken Williams
1805 N. Dixie Hwy.
Lima, OH 45801
419-879-1102
kenw@watchtv.net

Sincerely,



Ken Williams
President and Chief Executive Officer
W.A.T.C.H. TV Company

Such information was meant to demonstrate that an applicant has the technical qualifications to bid for specific performance tier and latency combinations. Specifically, the FCC required that an applicant must submit high-level operational information to complete its operational showing and demonstrate that it can be expected to be reasonably capable of meeting the public interest obligations (e.g., speed, usage, latency, and service milestones) for each performance tier and latency combination selected.

Since the applicant intends to use radiofrequency spectrum to offer its voice and broadband services, it was required to submit information regarding whether the spectrum to which it has access will enable it to meet the public interest obligations for each performance tier and latency combination that it selects in its application.⁷ In addition, the FCC's Phase II auction rules required any applicant that plans to use spectrum to demonstrate that it has (i) the proper spectrum use authorizations, if applicable; (ii) access to operate on the spectrum it intends to use; and (iii) sufficient spectrum resources to cover peak network usage and meet the minimum performance requirements to serve the fixed locations in eligible areas.⁸

Pursuant to the FCC rules and as proposed in the *CAF II Comment Public Notice*, each long-form applicant will be required to demonstrate that it is technically qualified to meet the relevant Phase II public interest obligations in the areas covered by the winning bids by submitting technical information to support the operational assertions made in the short-form application.⁹ A

⁷ *Id.*, para 86.

⁸ *Id.*, para 87.

⁹ *Id.*, para, 298.

long-form applicant is required to submit a detailed technology and system design description, including a network diagram that must be certified by a professional engineer.¹⁰ The professional engineer must certify that the network can deliver, to at least 95 percent of the required number of locations in each relevant state, voice and broadband service that meets the requisite performance requirements. W.A.T.C.H submitted this information to the FCC on 11/3/2018.

Finally, as part of the FCC's requirement, within 60 days after the release of the Auction 903 closing public notice, a long-form applicant must submit a letter from a bank acceptable to the Commission, as set forth in section 54.315(b)(3), committing to issue an irrevocable stand-by letter of credit, in the required form, to the long-form applicant.¹¹ The letter must, at a minimum, provide the dollar amount of the letter of credit and the issuing bank's agreement to follow the terms and conditions of the Commission's model letter of credit in Appendix B of the Phase II Auction Order.¹² W.A.T.C.H submitted this information to the FCC on 11/2/2018.

Federal Act

Pursuant to Section 214(e)(2) of the Act, a state commission may upon its own motion or request designate a common carrier to be an "eligible telecommunications carrier" for the purposes of receiving universal service support under the Act. Section 214(e)(2) requires the designated carrier meet the requirements of Section 214(e)(1). Section 214(e)(1) states:

¹⁰*Id*

¹¹ 47 CFR § 54.315(b)(3), (c)(2). *See also id.* § 54.315(c); *Phase II Auction Order*, 31 FCC Rcd at 5989-99, paras. 119-40 (describing the letter of credit requirements).

¹² 47 CFR § 54.315(b)(3); *See also Phase II Auction Order*, 31 FCC Rcd at 6045-49, Appx. B.

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Case No(s). 18-1555-TP-UNC

Summary: Application Revised pages for Application and Petition electronically filed by Debra A Thelen on behalf of W.A.T.C.H. TV COMPANY