

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| <b>In the Matter of</b>  | ) |                                |
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| <b>Petition of Cincinnati Bell Extended Territories LLC for Designation as a Competitive Eligible Telecommunications Carrier Within Its Connect America Fund Phase II Auction Awarded Census Block Group</b> | ) | <b>Case No. 18-1685-TP-UNC</b> |
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**SUPPLEMENT TO  
PETITION OF CINCINNATI BELL EXTENDED TERRITORIES LLC FOR  
DESIGNATION AS A COMPETITIVE ELIGIBLE TELECOMMUNICATIONS  
CARRIER WITHIN ITS CONNECT AMERICA FUND PHASE II AUCTION  
AWARDED CENSUS BLOCK GROUP**

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Cincinnati Bell Extended Territories LLC (“CBET”) hereby files this supplement to the petition it filed with the Commission on November 14, 2018. Specifically, with this supplement CBET clarifies three issues relevant to its petition for designation as a Competitive Eligible Telecommunications Carrier (“CETC”) within its Connect America Fund Phase II auction awarded census block group. First, it addresses the pricing for the voice and broadband services it will offer in the ETC area; second, it clarifies the locations that will be eligible to receive its voice and broadband service; and third, it clarifies how it will advertise the availability of Lifeline service to households within the ETC area.

**I. PRICING FOR CBET’S VOICE AND BROADBAND SERVICE WILL BE CONSISTENT WITH THE FEDERAL COMMUNICATIONS COMMISSION’S RATE COMPARABILITY BENCHMARK**

Pursuant to Federal Communications Commission (“FCC”) Rule 47 C.F.R. §54.309(a), a carrier receiving CAF Phase II support must “offer broadband service with latency suitable for

real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, at rates that are reasonably comparable to rates for comparable offerings in urban areas.” Each year the FCC’s Wireline Competition Bureau announces a benchmark rate for voice and broadband services for purposes of satisfying this requirement. The reasonable comparability benchmarks for voice and broadband services for 2019 are \$51.61 for voice service and \$162.33 for 1 gigabit broadband service with unlimited capacity allowance.<sup>1</sup> CBET’s current rates for voice and broadband service are currently below the 2019 benchmarks and as attested to in the attached affidavit (Exhibit L) from James Backus, the Senior Product Manager for voice and broadband services for Cincinnati Bell, CBET will continue to offer voice and broadband services priced at or below the reasonable comparability benchmarks that the FCC sets in the future.

## **II. CBET WILL OFFER SERVICE TO ALL LOCATIONS WITHIN THE REQUESTED ETC DESIGNATION AREA**

Section § 214(e)(1) of the Communications Act and § 54.201(d) of the FCC’s Rules require that a common carrier designated as an ETC “shall offer the services that are supported by the federal universal service support mechanisms *throughout the service area for which the designation is received*” (emphasis added). The census block for which CBET was awarded CAF Phase II support currently has only one location and CBET’s auction buildout commitment only requires it to extend its voice and broadband service to a single location. Nonetheless, CBET will offer voice and gigabit broadband service to any other locations that may be built within the requested ETC designation area, in accordance with the 47 C.F.R. § 54.201(d)

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<sup>1</sup> Wireline Competition Bureau Announces Results of 2019 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers, WC Docket No. 10-90, Public Notice DA 18-1280 (December 20, 2018).

requirement that an ETC offer service throughout the service area for which the designation is received.

### **III. EACH HOUSEHOLD WITHIN THE DESIGNATED ETC SERVICE AREA WILL BE NOTIFIED ABOUT THE AVAILABILITY OF LIFELINE SERVICE**

In its petition, CBET indicated that it would advertise the availability of Lifeline service within the its designated ETC area by using the Cincinnati Bell website as well as via an annual Lifeline advertisement in local print media. In addition, CBET will also send a direct mail notice to each household within the designated ETC area informing them of the availability of Lifeline service from CBET. CBET herein clarifies these statements.

Cincinnati Bell Telephone Company (“CBT”) and CBET share a common website – [www.cincinnati-bell.com](http://www.cincinnati-bell.com). Currently, the Lifeline page on this website indicates that Lifeline is only available within the CBT traditional serving area. Once CBET is designated an ETC and begins offering service in its designated ETC area, the Lifeline page will be updated to reflect the availability of Lifeline within the CBET ETC area as well as the CBT service area. Likewise, Cincinnati Bell currently runs an ad in local print media once per quarter. When CBET begins offering service in its designated ETC area, the quarterly print ad will be amended to reflect the availability of Lifeline within the CBT service area and the CBET ETC area.

In addition, when service is newly available in the designated ETC area, CBET will send each household in the newly qualified area a direct mail notice apprising them of the availability of Lifeline service from CBET. Thereafter, CBET will also send each subscriber within its designated ETC area an annual notice, via direct mail or bill message, apprising them of the availability of Lifeline. CBET believes this annual notice will be the most effective means of reaching prospective Lifeline customers within its designated ETC area.

### III. CONCLUSION

Upon review of these clarifications to its petition, CBET respectfully requests that the Commission expeditiously grant CBET's Petition requesting designation as a ETC in the area for which it was the winning bidder in the FCC's CAF Phase II auction.

Respectfully submitted,

/s/ **Douglas E. Hart**

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**EXHIBIT L**


**AFFIDAVIT REGARDING  
REASONABLY COMPARABLE RATES**

**AFFIDAVIT REGARDING  
REASONABLY COMPARABLE RATES  
AS REQUIRED BY 47 C.F.R. §54.309(a)**


STATE OF OHIO                     )  
  ) ss:  
COUNTY OF HAMILTON    )

My name is James J. Backus Jr. I am a Senior Product Manager for Cincinnati Bell. My responsibilities include product strategy and pricing for voice and broadband services offered by Cincinnati Bell Extended Territories LLC ("CBET").

I herein affirm that the rates that CBET currently charges for voice and broadband service are below the 2019 reasonable comparability benchmark for these services as established by the Federal Communications Commission ("FCC"). I further affirm that, in accordance with the requirements of 47 C.F.R §54.309(a), for areas in which CBET will receive Connect America Fund support, it will maintain rates at or below the reasonable comparability benchmarks set by the FCC in future years.

  
James J. Backus, Jr.

Sworn to and subscribed before me this 23<sup>rd</sup> day of January, 2019.

  
Notary Public



KATHLEEN M. CAMPBELL  
Notary Public, State of Ohio  
My Commission Expires 10-14-2023

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**Case No(s). 18-1685-TP-UNC**

Summary: Petition Supplement to Petition of Cincinnati Bell Extended Territories LLC for Designation as a Competitive Eligible Telecommunications Carrier Within Its Connect America Fund Phase II Auction Awarded Census Block Group electronically filed by Ms. Patricia L Rupich on behalf of Cincinnati Bell Extended Territories LLC