

January 6, 2021

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

RE: Southern Ohio Communication Services Inc.
ETC Designation Request

Please find enclosed the request of Southern Ohio Communication Services Inc. for designation as an Eligible Telecommunications Carrier (ETC) designation for certain census blocks in the State of Ohio.

Please direct inquiries regarding Southern Ohio Communications Services' petition to:

Stephen E. Coran
Rebecca Jacobs Goldman
Lerman Senter PLLC
2001 L Street, NW
Washington, DC 20036
(202) 416-6744
scoran@lermansenter.com
rgoldman@lermansenter.com

Sincerely,

/s/ Rebecca Jacobs Goldman
Rebecca Jacobs Goldman
*Counsel to Southern Ohio
Communications Services, Inc*



The Public Utilities Commission of Ohio
**TELECOMMUNICATIONS SUPPLEMENTAL APPLICATION FORM for
COMPETITIVE ELIGIBLE TELECOMMUNICATION CARRIER (CETC)
DESIGNATION HIGH-COST UNIVERSAL SERVICE**
**Per the Commission’s 05/29/2019 “Implementation Order” in Case No. 19-0173-TP-ORD
(Effective 04/24/2020)**

In the Matter of the Application of Southern Ohio)	TRF Docket No. 90-	-TP-TRF
Communication Services Inc. Petition for)	Case No. 21 - <u>0024</u> -TP-UNC	
Designation as a High-Cost Rural Competitive)	Note: Unless you have reserved a Case No.,	
Eligible Telecommunications Carrier.)	leave the “Case No.” field BLANK.	

Name of Applicant: Southern Ohio Communications Services, Inc.
DBA(s) of Applicant: SOCS
Address of Applicant: 219 W. Emmitt Ave., Waverly, OH 45690
Applicant’s Web Address: www.socs.cc
Contact Person(s): Bret W. Childers, COO
Contact Person’s Email Address: bchilders@socs.cc Phone: (740) 947-3502

Part I – Requirements:

Facilities-based Wireline applicants must obtain a Certificate of Public Convenience and Necessity in Ohio prior to applying for CETC Designation.

Facilities-based Wireless applicants must register as a Wireless Service Provider in Ohio prior to applying for CETC Designation.

Part II – Requirements:

Demonstration of Rural Telephone Company Status

The Carrier provides that it meets at least one of the following four criteria for rural telephone status (**check at least one**) consistent with the Communications Act of 1934, as amended (SEC 3 [47 USC § 153(44)]).

Section 3 [47 USC § 153(44)] states that the term “rural telephone company” means a local exchange carrier operating to the extent that such entity:

- ☐ (A) provides common carrier service to any local exchange carrier study area that does not include either –
- (i) any incorporated place of 10,000 inhabitants or more, or any part thereof, based on the most recently available population statistics of the Bureau of the Census; or

(ii) any territory, incorporated or unincorporated, included in an urbanized area, as defined by the Bureau of Census as of August 10, 1993;

- ☒ (B) provides telephone exchange service, including exchange access, to fewer than 50,000 access lines;
- ☐ (C) provides telephone exchange service to any local exchange carrier study area with fewer than 100,000 access
- ☐ (D) has less than 15 percent of its access lines in communities of more than 50,000 on the date of enactment of the Telecommunications Act of 1996.

If the carrier checks any letter other than “B” or “C” above, it must attach supporting documentation to this application demonstrating how it meets the criteria delineated in either “A” or “D.”

FCC Required Services – 47 C.F.R. §54.101

- ☒ The carrier provides that it is capable of providing the following services supported by the federal universal service fund.
- Voice grade access to the public switched network or its functional equivalent;
 - Minutes of use for local service at no additional charge to end users;
 - Access to emergency services, including 911 and enhanced 911; and
 - Toll limitation for qualifying low-income customers

Facilities – 47 C.F.R. §54.201(d)(1)

The carrier will offer the services that are supported by the federal universal service support mechanism under subpart B of 47 C.F.R. §54 and section 254(c) of the Communications Act of 1934, as amended, with either:

- ☐ Its own facilities;
- ☐ Its own facilities (which includes the purchase of unbundled network elements);
- ☒ Its own facilities and resale of another carrier’s services; or
- ☐ Its own facilities (which include the purchase of unbundled network elements) and resale.

Advertising – 47 C.F.R. §54.201(d)(2)

- ☒ The carrier will advertise the availability of supported services and the rates in a print media of general circulation throughout its service territory.

Public Interest Standard – 47 C.F.R. §54.202(b)

Determination of the public interest standard will be evaluated on a case-by-case basis, taking into consideration the increased customer choice. In the case of an applicant seeking designation below the study area level of a rural telephone company, a cream-skimming analysis may be appropriate; comparing the population density of each wire center in which the applicant seeks designation against that of the wire centers in the study area which the applicant does not seek designation, as well as other determining factors.

CETC requirements – 47 C.F.R. §54.202(a) and [§54.320(b)].

In order to be designated an eligible telecommunications carrier under section 214(e)(6), the carrier's application must:

☒ Certify that it will comply with the service requirements applicable to the support that it receives [§54.202(a)(1)(i)].

☒ Submit a five-year plan[§54.202(a)(1)(ii)].

☒ Remain functional in emergency situations[§54.202(a)(2)].

☒ Commit to satisfy applicable consumer protection and service quality standards. A Wireless applicant's commitment to comply with the Cellular Telecommunications and Internet Associations' Consumer Code for Wireless Service will satisfy this requirement. Other commitments will be evaluated on a case-by-case basis [§54.202(a)(3)].

☒ Retain all records required to demonstrate to auditors that the support received was consistent with the universal service high-cost program rules. This documentation must be maintained for at least ten years from the receipt of funding[§54.320(b)].

Part III – Exhibits

The following exhibits are required for all filings:

Include d	Identified As:	Description of Required Exhibit:
<input checked="" type="checkbox"/>	Exhibit A	5-year plan specifically detailing proposed improvements or upgrades to applicant's network throughout its proposed designated service area:

		<ul style="list-style-type: none"> • Estimate the specific areas where the improvements will be made; and • Estimate the population that will be served as a result of the improvements.
<input checked="" type="checkbox"/>	Exhibit B	<p>Demonstrate the ability to remain functional in emergency situations, including a demonstration that the carrier:</p> <ul style="list-style-type: none"> • has a reasonable amount of back-up power to ensure functionality without an external power source; • is able to reroute traffic around damaged facilities; and • is capable is managing traffic spikes resulting from emergency situations.
<input checked="" type="checkbox"/>	Exhibit C	Public Interest Standard – Please explain customer benefits or unique advantages.
<input checked="" type="checkbox"/>	Exhibit D	Please provide proposed advertising language, a copy of all advertising material and indicate the type of media to be employed.

Part IV – Attestation

Applicant hereby attests to its compliance with pertinent entries and orders issued by the Commission.

AFFIDAVIT

Compliance with Commission Rules

I, Bret W. Childers, am an officer/agent of the applicant corporation, Southern Ohio Communication Services Inc., and I am authorized to make this statement on its behalf.

I attest that this petition complies with all applicable rules for the State of Ohio. I understand that this petition does not imply Commission approval and that the Commission's rules, as modified and clarified from time to time, supersede any contradictory provisions in this petition. We will fully comply with the rules of the State of Ohio and understand that noncompliance can result in various penalties, including the suspension of our certificate to operate within the State of Ohio.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 4, 2021 at Waverly, Ohio

January 4, 2021



*Bret Childers, Chief Operating Office

Date

**This affidavit is required. It may be signed by counsel, an officer of the applicant or an authorized agent of the applicant.*

VERIFICATION

I, Bret W. Childers, verify that I have utilized the Supplemental Application for petition for Designation as a Competitive Eligible Telecommunications Carrier for High-Cost Universal Service provided by the Commission and all of the information here, and all additional information submitted in connection with this petition, is true and correct to the best of my knowledge.

*(Signature and Title)  C.O.O.

(Date) 1/4/21 _____

**Verification is required for every filing. It may be signed by counsel or an officer of the applicant, or an authorized agent of the applicant.*

Make such filing electronically as directed in Case No 06-900-AU-WVR

Or

Send your completed Supplemental Application Form, including all required attachments as well as the required number of copies, to:

Public Utilities Commission of Ohio
Attention: Docketing Division
180 East Broad Street, Columbus, OH 43215-3793

STATE OF OHIO
PUBLIC UTILITIES COMMISSION OF OHIO

SOUTHERN OHIO COMMUNICATION)	
SERVICES INC.)	
)	
)	Docket No. _____
)	
Application for Designation as an Eligible)	
Telecommunications Carrier for Purposes of)	
Receiving Federal Universal Service Support)	
For the Purpose of Participating in the FCC's)	
Rural Digital Opportunity Fund ("RDOF"))	
)	

SOUTHERN OHIO COMMUNICATION SERVICES INC.
APPLICATION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER

Pursuant to the Section 214(e)(6) of the Communications Act of 1934, as amended ("Act") and Section 54.201 of the rules of the Federal Communications Commission ("FCC"), Southern Ohio Communication Services Inc. ("SOCS") respectfully requests designation as an eligible telecommunications carrier ("ETC") by the Public Utilities Commission of Ohio ("Commission") to designate SOCS as a telecommunications carrier eligible under the provisions of Section 54.201(d) to receive federal Universal Service Fund ("USF"), including support through the FCC's high-cost USF program in order to receive funds pursuant to the FCC's Rural Digital Opportunity Fund ("RDOF"). SOCS is obligated to obtain ETC designation within 180 days of the RDOF Phase I Auction Closing Public Notice (i.e., by June 7, 2021),¹ and therefore requests expeditious action so that it may meet this requirement.

¹ Public Notice, *Rural Digital Opportunity Fund Phase I (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021*, DA 20-1422 (rel. Dec. 7, 2020) ("RDOF Phase I Auction Closing Public Notice") attached as Exhibit E.

I. INTRODUCTION AND COMPANY BACKGROUND

On December 7, 2020, the FCC announced the winning bidders for the RDOF Phase I auction (Auction 904).² SOCS is a member of the NexTier Consortium (“Consortium”) that was announced as a winning bidder for a total of 6467 locations in the state of Ohio with a total support amount of \$302,456.70. On December 21, 2020, the Consortium timely notified the FCC that it would be dividing its winning bids, and identified SOCS to be the entity that would file for ETC designation for the census blocks identified in Exhibit F hereto. There are a total of 6467 locations across all census blocks in which SOCS is seeking ETC designation.

SOCS was established in 1977 and has its principal place of business at 219 W. Emmitt Ave., Waverly, OH 45690. SOCS is in good standing in the State of Ohio.³ SOCS provides facilities-based fixed broadband and voice services to residential and business customers in rural and remote areas of southern Ohio using fixed wireless and fiber technologies. SOCS does not provide services in states other than Ohio. With its RDOF support, SOCS will construct and operate a new state-of-the-art fiber optic network to provide 1 Gpbs/500 Mbps voice and high-speed broadband Internet access services to the census blocks listed on Exhibit F.

II. SOCS SATIFIES THE ELIGIBILITY REQUIREMENTS FOR ETC DESIGNATION

Pursuant to Section 214(e)(2) of the Act, state commissions are authorized to designate as an ETC any common carrier that, through the service area for which the ETC status is sought, (i) offers the services that are supported by the federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier’s services, and (ii) advertises the availability of such services using media of general distribution.

² See *id.*

³ See copy of Certificate of Good Standing, attached as Exhibit G.

As demonstrated below, SOCS will satisfy these requirements and, therefore, should be designated as an ETC.

A. SOCS Will Provide Service Using a Combination of Its Own Facilities and Resale

Consistent with Section 214(e) of the Communications Act, SOCS will offer, throughout its supported areas, services through “a combination of its own facilities and resale of another carrier’s services.”⁴ SOCS will resell interconnected VoIP services provided by a third party and interconnected VoIP service to its end user customers.

B. SOCS Will Offer the Services Supported by the Federal Universal Service Support Mechanisms

For RDOF Phase I support recipients, the FCC defines the supported service as qualifying voice service and conditions grant of funding on the offering of qualifying broadband service.⁵ As described below, SOCS certifies that it will provide the following services that are supported by the federal universal service support mechanisms.

1. *Voice Grade Access to the PSTN* – Pursuant to Section 54.101(a) of the FCC’s rules, SOCS provides voice-grade access to the PSTN by offering interconnected VoIP service on a standalone basis through a wholesale agreement with a third party provider. SOCS will be legally responsible for dealing with customer problems, providing quality of service guarantees, and meeting the FCC’s universal service requirements.
2. *Local Usage* – SOCS’s service will include minutes of use for local service provided at no charge to end users (specifically, SOCS’s service plans will offer unlimited usage within the U.S.). SOCS will comply with any and all minimum local usage requirements adopted by the FCC or the PUC.

⁴ 47 U.S.C. § 214(e).

⁵ Section 254 of the Communications Act of 1934 provides the FCC authority to support telecommunications services, which the FCC has defined as “voice telephony service.” In adopting requirements for the Connect America Fund, the Commission made clear that the definition of “voice telephony service” was “technologically neutral.” *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692 (2011), *aff’d sub nom. In re FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014). The FCC adopted the same requirements for the RDOF program. *Rural Digital Opportunity Fund*, Report and Order, 35 FCC Rcd 686, 708 (2020).

3. *Access to Emergency Services* – SOCS will provide access to emergency services via 911 or E911.
4. *Toll Limitation Services for Qualifying Low-Income Customers* – SOCS will not distinguish between the pricing of toll and non-toll calls in the pricing of its voice service, and accordingly it is not obligated to provide toll limitation services to qualifying low-income consumers.⁶
5. *Broadband Internet Access Services* – SOCS’s broadband Internet offering will provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service.

SOCS initially plans to offer Internet service at speeds of 1 Gbps/500 Mbps for \$149.95 per month. SOCS initially plans to offer standalone voice telephone for \$44.95 per month. Pricing will maintain compliance with the FCC’s annual rate surveys.⁷

6. *Advertising the Availability of Supported Services* – SOCS will advertise the availability of each of the supported services described above and the availability of Lifeline benefits, throughout its ETC service area, by media of general distribution, including post cards, direct mailings, radio commercials, social media, and the Internet. SOCS will advertise the availability of its services and charges through media of general distribution in a manner reasonably designed to reach potential Lifeline consumers and make them aware of such offerings, as required by FCC rule 54.405(b). SOCS will conduct business solely under the applicant’s name and will not use additional service or brand names without authorization from the Commission.

III. RELIEF REQUESTED

For the reasons set forth above, having demonstrated herein that SOCS satisfies all the conditions of eligibility necessary for designation as an ETC in Ohio, and having shown that grant of the certification will be in the public interest of consumers in Ohio, SOCS respectfully requests that the Commission expeditiously grant this Application on or before June 7, 2021 to

⁶ 47 CFR § 54.401(c).

⁷ See, e.g., Public Notice, *Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 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*, DA 20-1409 (rel. Nov. 30, 2020). See also Public Notice, *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Dockets No. 09-197 and 10-90, DA 18-714 at 3-4 (rel. Jul. 10, 2018).

designate SOCS as an ETC so that it is eligible to receive high-cost federal universal service funding.

Respectfully submitted,

/s/ Bret W. Childers_____

Bret W. Childers, COO
Southern Ohio Communication Services Inc.
219 Emmitt Ave.
Waverly, OH 45690
(937) 834-4249
bchilders@socs.cc

Stephen E. Coran
Rebecca Jacobs Goldman
Lerman Senter PLLC
2001 L Street, NW, Suite 400
Washington, DC 20036
(202) 416-6744
scoran@lermansenter.com
rgoldman@lermansenter.com
*Counsel to Southern Ohio
Communication Services Inc.*

VERIFICATION

I, Bret W. Childers, COO of Southern Ohio Communication Services Inc., state under penalty of perjury:

1. I am an officer authorized to act on behalf of Southern Ohio Communication Services Inc.
2. The foregoing statements are true, accurate, and correct to the best of my knowledge, information, and belief.



SWORN AND SUBSCRIBED before me on this the 4th day of January, 2021.



Notary Public

My Commission Expires:

September 11, 2022

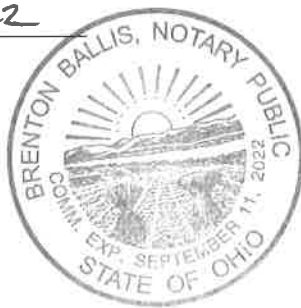


EXHIBIT A

FCC HAS WAIVED REQUIREMENT FOR SUBMISSION OF FIVE-YEAR PLAN

For the purposes of RDOF funding, the FCC waived the requirement for submission of a five-year improvement plan. In June of 2020, by Public Notice, the FCC established requirements for applicants seeking RDOF funding.⁸ The Public Notice referenced the procedures for designation of an ETC established for the Connect America Fund II (“CAF II”) where the FCC expressly waived the requirement for submission of a five-year improvement plan for funding recipients.⁹

Accordingly, consistent with 4901:1-6-09 of the Commission’s rules, the SOCS application satisfies compliance with all federal requirements without submission of the five-year plan.

⁸ Public Notice, *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, FCC 20-77 (2020).

⁹ *Id.* at. 6127-6128; see also Public Notice, *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, 33 FCC Rcd 6696, 6696-6697 (2018).

EXHIBIT B

DEMONSTRATION OF FUNCTIONALITY DURING EMERGENCY SITUATION

SOCS will have the ability to remain functional in emergency situations. SOCS has a reasonable amount of back-up power to ensure functionality without an external power source. Each of SOCS's facilities also has back-up power generators to ensure functionality without an external power source. SOCS will further be able to re-route traffic around damaged facilities by utilizing redundant fiber at each of its facilities, and will be capable of managing traffic spikes resulting from emergency situations via network engineering design.

EXHIBIT C

PUBLIC INTEREST STANDARD

Designation of SOCS as an ETC will serve the public interest by ensuring that SOCS is eligible to receive federal Universal Service Fund support and RDOF funding made available by the FCC for the expansion of broadband and voice service in rural America. SOCS will use this federal funding to expand access to high-speed broadband and voice provided through interconnected VoIP. These services will support connectivity to residents and commercial businesses, especially hard-hit due to the COVID-19 pandemic, and provide an alternative to services traditionally provided by wireline carriers.

Designation of SOCS as an ETC will also promote enhanced competition in SOCS's ETC service area, prompting competitors to enhance their existing networks and improve quality of service. Enhanced competition will also provide consumers additional choices in service providers and more competitive rates.

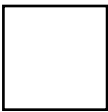
EXHIBIT D

PROPOSED ADVERTISING LANGUAGE



SOCS

Where you Live, Work
and Play



Whether at home or work SOCS is the technology partner you can count on.

From our multi-county internet coverage footprint to our specialized business services, SOCS delivers the solutions you need. SOCS is serving customers across the US with cutting edge VoIP phone services and advanced connectivity products. If you are looking for a technology partner that can deliver the services you want to where you live, work, and play, contact SOCS today.

YOUR SOLUTIONS PARTNER



Internet

SOCS provides you with the internet you need to stay connected with friends, family, and colleagues across the globe. Packages starting at \$46.95



Phone

SOCS Provides you with the reliable phone service that you expect. With access to services like call waiting, call forwarding, and unlimited local and long distance calling. Service starting as low as 44.99



Business Services

Get the IT services that you need so you can focus on running your business. Performance monitoring, anti-virus, risk analysis, remote backup, Private-WAN, and SD-WAN.



(740) 947-2409



219 W Emmitt Ave
Waverly, Ohio 45690



info@socs.cc



socs.cc
socswireless.com
socs4biz.com

SOCS phone service provides connections to the PSTN and emergency services via E911. Customers with financial limitations may qualify for lifeline service that SOCS provides at a reduced cost. To learn more about life line services and if you qualify please contact us or visit <https://www.lifelinesupport.org>

EXHIBIT E

RDOF PHASE I CLOSING AUCTION PUBLIC NOTICE



PUBLIC NOTICE

Federal Communications Commission
45 L Street, NE
Washington, DC 20554

News Media Information: 202-418-0500
Internet: www.fcc.gov
TTY: 888-835-5322

DA 20-1422
December 7, 2020

RURAL DIGITAL OPPORTUNITY FUND PHASE I AUCTION (AUCTION 904) CLOSES

WINNING BIDDERS ANNOUNCED

FCC FORM 683 DUE JANUARY 29, 2021

AU Docket No. 20-34
WC Docket 19-126
WC Docket No. 10-90

1. By this Public Notice, the Rural Broadband Auctions Task Force, Office of Economics and Analytics (OEA), and Wireline Competition Bureau (WCB) announce that bidding in the Rural Digital Opportunity Fund Phase I auction (Auction 904) concluded on November 25, 2020. There were 180 winning bidders in the auction, with the 10-year support amount totaling \$9.23 billion and covering 5,220,833 locations in 49 states and one territory. Of the 5,295,771 locations in the 61,766 eligible census block groups, approximately 99% of the locations are covered by winning bids. While winning bids are for a range of performance tiers, winning bids for downstream speeds of at least 100 megabits per second (Mbps) cover 99.7% of these locations, with over 85% of locations covered by winning bids for Gigabit speed service.

2. Winning bidders are required to submit a post-auction application for support (FCC Form 683) no later than **January 29, 2021**. Winning bidders that wish to assign some or all of their winning bids to related entities must do so by **December 22, 2020**, using the Divide Winning Bids process described below.

I. WINNING BIDDERS

3. This Public Notice summarizes the results of the auction and provides winning bidders with important information, including FCC Form 683 filing requirements and support disbursement matters. Key information appears in the following attachments:

Attachment A: “Winning Bidders Summary” lists for each bidder: the state, the 10-year assigned support amount, and the number of locations assigned in winning bids.

Attachment B: “State Results Summary” lists for each state with eligible areas in Auction 904: the total 10-year assigned support, the number of locations assigned, and the number of bidders with winning bids.

Attachment C: “FCC Form 683: Application for Rural Digital Opportunity Fund Phase I Support – Instructions.”

4. A copy of this Public Notice will be sent to each qualified bidder via overnight delivery to the contact person at the contact address listed in each qualified bidder’s short-form application (FCC Form 183).

II. AUCTION RESULTS

5. Concurrent with the release of this Public Notice, the Commission is making available the detailed auction results and bidding information described below.

Online Map: An interactive visual representation of the auction results is available on the Auction 904 web page (www.fcc.gov/auction/904). On the interactive map available at this webpage, there are options for displaying all eligible areas and non-winning bids. Clicking on a state or winning bid listed on the right-hand side of the map will zoom the map to that area.

Results Data: An online viewer of results data and downloadable files that include the identities of bidders and all their submitted bids are now available in the FCC Auctions Public Reporting System (auctiondata.fcc.gov), for which there is a link on the Results tab on the Auction 904 web page (www.fcc.gov/auction/904).¹

6. Additionally, the Commission will soon make available certain, previously withheld information submitted in the applications to participate in the auction (FCC Forms 183). This information includes the state(s) and performance tier and latency combination(s) for which each applicant was found to be eligible.² The applications are viewable through the application search feature, which can be accessed through the Application Search tab on the Auction 904 web page.

III. POST-AUCTION PROCEDURES

7. Under the competitive bidding rules adopted in the *Rural Digital Opportunity Fund Order*, Auction 904 winning bidders must file a post-auction application for support, also referred to as FCC Form 683, consistent with all requirements of the long-form application process.³ FCC Form 683 has two discrete parts—the Divide Winning Bids portion and the long-form application portion. Each winning bidder is required to file an FCC Form 683 to become authorized to receive support. Prior to completing the long-form application portion, a winning bidder may divide its winning bids by assigning them to related entities, as described below.⁴ If a winning bidder assigns its winning bids to related

¹ Because bids in Auction 904 implied annual support amounts, the bids and results data in the FCC Auctions Public Reporting System are on an annual basis, in contrast to the 10-year total support amounts reported in Attachments A and B.

² We will continue to withhold from routine public inspection responses to the technical questions in Appendix A of the *Auction 904 Procedures Public Notice* and any supporting information; financial information for which confidential treatment was requested under the section 0.459(a)(4) abbreviated confidential treatment process; and any other information subject to a request for confidential treatment that has been granted or remains pending. See *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, AU Docket No. 20-34 et al., Public Notice, 35 FCC Rcd 6077, 6129-30, para. 141 (2020) (*Auction 904 Procedures Public Notice*). Further, to prevent possible public dissemination of information related to bids or bidding strategies in Auction 107—an auction for flexible-use service licenses in the 3.7 GHz Band in which bidding is scheduled to commence on December 8—the data fields in which applicants identified specific spectrum bands that they proposed to use and spectrum access attachments will continue to be withheld from routine public inspection until the prohibition of certain communications in Auction 107 concludes. See 47 CFR 1.2105 (c); *Auction of Flexible-Use Service Licenses in the 3.7–3.98 GHz Band for Next-Generation Wireless Services; Notice and Filing Requirements, Minimum Opening Bids, Upfront Payments, and Other Procedures for Auction 107; Bidding in Auction 107 Scheduled to Begin December 8, 2020*, AU Docket No. 20-25, Public Notice, 35 FCC Rcd 8404, 8418, para. 44 (2020).

³ 47 CFR § 1.21004; *Rural Digital Opportunity Fund et al.*, WC Docket No. 19-126 et al., Report and Order, 35 FCC Rcd 686, 696, para. 22 (2020) (*Rural Digital Opportunity Fund Order*).

⁴ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6164-65, paras. 288-93.

entities, those entities will be required to file the long-form application portion of an FCC Form 683 for those winning bids, as described below. A winning bidder will be responsible for completing the long-form application portion of FCC Form 683 for any winning bids that it does not assign to a related entity.

8. **Winning bidders that intend to file a long-form application covering all their winning bids are not required to participate in the Divide Winning Bids process.** Any winning bidder that does not submit the Divide Winning Bids portion of FCC Form 683 prior to 6:00 p.m. ET on December 22, 2020, must file a long-form application that covers *all* its winning bids. In such circumstances, the winning bidder must file the long-form application in its own name, be designated as the eligible telecommunications carrier (ETC) to serve the relevant areas, be named in the requisite letter(s) of credit, and fulfill the public interest obligations associated with receiving Rural Digital Opportunity Fund Phase I support.⁵

A. Divide Winning Bids Portion of FCC Form 683

9. Any winning bidder that intends to assign some or all its winning bids to related entities must do so by submitting the Divide Winning Bids portion of the FCC Form 683 during the Divide Winning Bids filing window. **The Divide Winning Bids filing window will open at 10:00 a.m. Eastern Time (ET) on Wednesday, December 9, 2020, and close at 6:00 p.m. ET on Tuesday, December 22, 2020.** During this period, a winning bidder will be able to log into the Auction Application System using the FCC Registration Number (FRN) that it used to file its short-form application and complete the Divide Winning Bids portion of FCC Form 683. The instructions in Attachment C explain how a winning bidder can assign its winning bids to related entities.

10. A winning bidder may only assign its winning bids to a related entity that is named in its short-form application or that was formed after the short-form application deadline (i.e., July 15, 2020).⁶ The Auction Application System will not permit a winning bidder to assign its winning bids to another winning bidder. A related entity is an entity that is controlled by the winning bidder or is a member of (or an entity controlled by a member of) a consortium/joint venture of which the winning bidder is a member.⁷ Thus, if a holding company/parent company is a winning bidder in Auction 904, the winning bidder may designate one or more operating companies that it controls to complete the long-form application to receive Rural Digital Opportunity Fund support for some or all of the winning bids in a state. If a consortium/joint venture is a winning bidder in Auction 904, the entity may designate one or more members (or entities controlled by members of) the consortium/joint venture to complete the long-form application to Rural Digital Opportunity Fund support for some or all of the winning bids in a state.

11. A winning bidder may assign winning bids to more than one entity in a single state, but it cannot assign a single winning bid to more than one entity.⁸ Thus, a winning bidder may not split among multiple entities either: 1) eligible census blocks within a winning bid for an individual census block group, or 2) separate census block groups within a winning package bid.⁹

⁵ Subject to the limited exception described below for multiple operating companies operating in a state.

⁶ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6165, para. 291.

⁷ *Id.* at 6164, para. 289.

⁸ *Id.* at 6164, para. 290.

⁹ For example, assume a winning bidder has three winning bids—package bid A, package bid B, and single bid (i.e., one census block group) C. The winning bidder could assign package bid A to one related entity, package bid B to another related entity, and single bid C to a third entity. The winning bidder could not assign some census block groups from package bid A to one related entity and then the remaining census block groups from package bid A to another entity. The entire package bid must be assigned to one related entity. Similarly, the winning bidder could not assign some eligible census blocks from single bid C to one entity and then the remaining eligible census blocks from single bid C to another related entity. The entire census block group covered by the single winning bid must be assigned to one related entity.

12. Each entity that is assigned a winning bid through the Divide Winning Bids process is the entity that must file the long-form application portion of FCC Form 683 in its own name. Except for one limited exception, that long-form applicant must be designated as the eligible telecommunications carrier to serve the relevant area(s), be named in the requisite letter(s) of credit, and fulfill the public interest obligations associated with receiving Rural Digital Opportunity Fund support.¹⁰

13. For administrative convenience, if a winning bidder is a holding/parent company that has multiple operating companies in a state and intends to assign its winning bids to multiple operating companies in a state, it may choose one of those entities to be the lead operating company.¹¹ In such circumstances, the winning bids should be assigned to that lead operating company, the long-form application should be filed in the name of the lead operating company, the letter of credit should be in the name of the lead operating company, and payments will be made to the study area code associated with the lead operating company. However, the long-form application must identify which operating companies will meet the public interest obligations for which census block groups and documentation must be submitted that demonstrates that each of the operating companies has an ETC designation covering the relevant census block groups. As decided in the *Rural Digital Opportunity Fund Order*, compliance with the service milestones will be determined on a statewide basis across all the relevant operating companies.¹²

14. A winning bidder that assigns some or all its winning bids to a related entity must make several certifications in the Divide Winning Bids portion of FCC Form 683. In particular, it must certify and acknowledge that it:

- has assigned the winning bids to related entities that were named in the short-form application or are newly formed,
- will inform each entity of its filing obligation and cause each entity to submit a timely FCC Form 683 long-form application,
- will be at risk for default if any of the related entities do not submit a timely FCC Form 683 long-form application, and
- will submit a timely FCC Form 683 long-form application for any of the winning bids that it did not assign to another entity.

B. Obligation to Apply for Support – Long-Form Application Portion of FCC Form 683

15. A winning bidder that retains any of its bids, as well as all entities that are assigned winning bids by a winning bidder, must electronically submit the long-form application portion of FCC Form 683 covering those bids prior to the close of the long-form application filing window. **The long-form application filing window will open at 10:00 a.m. ET on Thursday, January 14, 2021, and will close at 6:00 p.m. ET on Friday, January 29, 2021.** Certain additional information may be submitted to the Commission after this filing window closes, as described below. **The Auction Application System will open a filing window at 10:00 a.m. ET on Thursday, January 14, 2021 to permit applicants to submit this additional information by the relevant deadlines.**

1. Deadlines

16. Attachment C of this Public Notice provides instructions for completing the long-form application portion of FCC Form 683. These instructions are consistent with the Commission's

¹⁰ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6165, para. 291.

¹¹ *Id.* at 6165, para. 292.

¹² *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 712, para. 54.

requirements fully described in section 54.804(b) & (c) of the Commission's rules and paragraphs 286 to 322 of the *Auction 904 Procedures Public Notice*.¹³ Below is a summary of the information that must be submitted by the applicable application deadlines:¹⁴

- **Information due prior to 6:00 p.m. ET on Friday, January 29, 2021:**
 - **Applicant information**, including legal classification (e.g., corporation, general partnership, etc.), jurisdiction of formation, address, contact information, and responsible individual
 - **Whether the applicant has already been designated as an eligible telecommunications carrier (ETC)** for all the eligible census blocks in a winning bid(s)¹⁵
 - If the applicant has already obtained a high-cost ETC designation that covers all the relevant areas in a state, it should submit the required ETC documentation and certification letter by this deadline so that Commission staff can expeditiously verify the applicant's ETC status in the state
 - If the applicant has obtained a high-cost ETC designation for only some of the relevant areas in a state, Commission staff will not verify the applicant's ETC status in a state until the applicant has submitted the required documentation and certification letter for *all* the relevant areas in the state
 - **Whether the applicant is required to submit audited financial statements** during the long-form application process and whether it seeks confidential treatment of those financial statements¹⁶
 - **Initial project overview(s)** describing at a high-level the applicant's intended technology and system design for each state with a winning bid.¹⁷ An applicant should not include any confidential trade secrets or commercial information in its overview(s), which will be made publicly available.
 - **Project funding description(s)** that explains how necessary construction will be funded in each state¹⁸
 - **Spectrum access description(s)** demonstrating that the applicant has sufficient access to spectrum in each state, if applicable¹⁹

¹³ 47 CFR § 54.804(b), (c); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6163-78, paras. 286-322; *see also Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 725-735, paras. 86-113.

¹⁴ As discussed in Attachment C, certain applicant information may be automatically transferred from a winning bidder's short-form application (FCC Form 183) to its long-form application (FCC Form 683).

¹⁵ By June 7, 2021, the long-form applicant must obtain from all the relevant states or the Commission a high-cost ETC designation(s) that cover its winning bid areas and upload the required documentation and a certification letter to its FCC Form 683. 47 CFR § 54.804(b)(5); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 316; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727-28, para. 92.

¹⁶ As noted below, the audited financial statements are due by June 7, 2021. 47 CFR § 54.804(b)(4); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6177, para. 318; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 722, para. 80.

¹⁷ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6167, para. 302.

¹⁸ 47 CFR § 54.804(b)(2)(vi); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6174-75, para. 312; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727, para. 91.

¹⁹ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6175, paras. 313-14.

- **Agreement information**, including information regarding any agreements relating to the applicant's participation in Auction 904²⁰
- **Ownership information**, including information regarding entities that have an ownership or other interest in the applicant and associated Commission-regulated businesses²¹
- **Various certifications**, including certifications regarding the applicant's compliance with statutory and regulatory requirements; financial and technical qualifications; available funds; compliance with the relevant public interest obligations and ETC requirements; and spectrum access, if applicable²²

17. We adopt a deadline of 70 days from the release of this Public Notice for long-form applicants to submit letter of credit commitment letters, as well as detailed technology and system design descriptions.²³

• **Information due prior to 6:00 p.m. ET on Monday, February 15, 2021:**

- **Letter of credit commitment letter(s)** for each applicable state from a qualified bank committing to issue an irrevocable stand-by letter of credit to the long-form applicant in the required form that covers the first year of support (at a minimum).²⁴ A long-form applicant with winning bids in multiple states may submit a single commitment letter that covers all of the relevant states as long as it is clear that the letter is applicable to the relevant states.
 - At a minimum, the letter must 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 C of the *Rural Digital Opportunity Fund Order*.²⁵
 - The bank eligibility requirements are described in detail in paragraph 107 of the *Rural Digital Opportunity Fund Order* and section 54.804(c) of the Commission's rules.²⁶
- **Detailed technology and system design description(s)** for the approved technology for each applicable state, including a network diagram certified by a professional engineer.
 - Paragraphs 301 to 311 of the Auction 904 Procedures Public Notice provide detailed guidance on how an applicant can successfully meet this requirement.²⁷

²⁰ *Id.* at 6138, para. 173.

²¹ 47 CFR §§ 1.2112(a), 54.804(b)(2)(i); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6165, para. 295; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 726, para. 87.

²² See, e.g., 47 CFR § 54.804(b)(2)(ii), (iii), (v), (vii); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6165-67, 6174-75, 6175-76, paras. 296-300, 312, 314.

²³ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6167, 6176, paras. 303, 315 (stating that this information would be due "[w]ithin the specified number of days after the release of the Auction 904 closing public notice").

²⁴ 47 CFR § 54.804(b)(3), (c)(2); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 315; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 732, para. 106.

²⁵ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 315; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 732, para. 106.

²⁶ 47 CFR § 54.804(c)(2); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 732, para. 107.

²⁷ 47 CFR § 54.804(b)(2)(iv); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6167-74, paras. 301-11; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 726, para. 90.

Further educational materials regarding this requirement will also be made available on the Auction 904 website, www.fcc.gov/auction/904.

- The professional engineer must certify that he or she has reviewed each state network diagram and that the network is capable of delivering, to at least 95% of the required number of locations in each relevant state, voice and broadband service that meets the requisite performance requirements.²⁸ For purposes of this requirement, while it is not necessary that the professional engineer certifying the network diagram have a Professional Engineer license, the certification should describe the professional engineer's qualifications such that the certifier's network design and performance expertise is apparent.
 - Wireless coverage maps should be submitted in ESRI Shapefile format. The component files (including the .SHP, .SHX, .DBF, and .PRJ files) should be uploaded in a single compressed .ZIP archive. Recommended standards and data fields will be made available on the Auction 904 website, www.fcc.gov/auction/904. Long-form applicants will see an error message when they upload the .ZIP archive to the long-form application, but the error will not prevent long-form applicants from submitting their applications provided that the submission occurs prior to the deadline and Commission staff should still be able to access the file. Commission staff will contact a long-form applicant after the filing deadline if there are any issues with the file. The FCC Form 683 attachment size limit is 10 MB.
- **Information due prior to 6:00 p.m. ET on Monday, June 7, 2021:**
 - **Documentation of high-cost ETC designation(s)** in all areas where the applicant will receive support, as described in paragraphs 316-317 of the *Auction 904 Procedures Public Notice*.²⁹ An applicant should also upload a .csv file of the census blocks that are covered by the ETC designation order.
 - **ETC certification letter(s)** from an officer of the applicant certifying that the long-form applicant's ETC designation(s) covers all the areas where the applicant will receive support.³⁰
 - If not provided with the FCC Form 183 short-form application by the long-form applicant or a related entity,³¹ **financial statements from the prior fiscal year (i.e., 2019) that have been audited by an independent certified public accountant**, including the balance sheets, statements of net income and cash flow, along with an opinion letter from an independent certified public accountant and the accompanying notes.³² An applicant

²⁸ 47 CFR § 54.804(b)(2)(iv); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6167, para. 301; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 726, para. 90. Note that all performance requirements for broadband and voice services have to be met at peak periods. See *Connect America Fund*, WC Docket No. 10-90, Order, 33 FCC Rcd 6509, 6517-21, paras. 22-33 (WCB/WTB/OET 2018) (*CAF Performance Measures Order*); *Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, 34 FCC Rcd 10109, 10116-10118, paras. 20-23 (2019) (*CAF Performance Measures Second Reconsideration Order*).

²⁹ 47 CFR § 54.804(b)(5); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, paras. 316-17; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727-28, para. 92.

³⁰ 47 CFR § 54.804(b)(5); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 316; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727-28, para. 92.

³¹ In this context, a related entity means the long-form applicant's parent/holding company or, if the long-form applicant is a member of a consortium or joint venture, the member of the consortium or joint venture that submitted financial statements with the short-form application.

can also submit fiscal year-end 2020 audited financial statements instead if they are available.

- The applicant must submit the audited financial statements of the entity that submitted its unaudited financial statements in the relevant FCC Form 183 short-form application or its own audited financial statements.³³
- Any applicant that fails to submit the audited financial statements as required by this deadline will be subject to a base forfeiture of \$50,000, which will be subject to adjustment upward or downward as appropriate based on criteria set forth in the Commission's forfeiture guidelines.³⁴

18. Timely submitted applications will be reviewed by Commission staff for completeness and compliance with the Commission's rules and to determine if the long-form applicant has demonstrated that it is technically and financially qualified to fulfill its Rural Digital Opportunity Fund public interest obligations if authorized to receive support. Commission staff will notify a long-form applicant if additional information is required. We expect long-form applicants to expeditiously complete their applications and respond in a timely manner to staff requests for additional or missing information.³⁵ If the application and the information with respect to each winning bid in a particular state is complete and the long-form applicant has demonstrated that it is technically and financially qualified, WCB will release a public notice identifying the applicant and the winning bids for which the Commission is ready to authorize Rural Digital Opportunity Fund support.³⁶ If a long-form applicant ultimately fails to provide all the required information or demonstrate that it is technically and financially qualified, WCB will release a public notice identifying the applicant and the winning bids that are considered in default.³⁷

- The applicant will have 10 business days from the release of the public notice indicating that the Commission is ready to authorize support to submit:
 - **Irrevocable standby letter of credit** for each state where the long-form applicant will be authorized to receive support. Long-form applicants should carefully review the letter of

(Continued from previous page) —————

³² 47 CFR § 54.804(b)(4); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6177, para. 318; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 722, para. 80.

³³ Accordingly, if the long-form applicant is a member of a consortium, it should submit the audited financial statements of the consortium member that submitted its unaudited financial statements in FCC Form 183. If the long-form applicant is an operating company of a holding company that filed an FCC Form 183 on behalf of the long-form applicant, the long-form applicant should submit the audited financial statements of the holding company. A long-form applicant also has the option of submitting its own audited financial statements instead.

³⁴ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6177, para. 318; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 722, para. 80; 47 U.S.C. § 503(b)(2)(B); 47 CFR § 1.80(b)(8), note to paragraph (b)(8).

³⁵ See 47 CFR § 1.21004(b) ("The Commission may dismiss a winning bidder's application with prejudice for failure of the winning bidder to prosecute, failure of the winning bidder to respond substantially within the time period specified in official correspondence or requests for additional information, or failure of the winning bidder to comply with requirements for becoming authorized to receive support. A winning bidder whose application is dismissed for failure to prosecute pursuant to this paragraph has defaulted on its bid(s)."); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 696, para. 22 (noting "the Commission will apply as appropriate any modifications to [the general competitive bidding rules] that it may adopt").

³⁶ 47 CFR § 54.804(b)(6)(v).

³⁷ A long-form applicant that defaults on a winning bid in a state may still be authorized to receive support for its remaining winning bids in that state.

credit requirements in section 54.804(c) of the Commission's rules and in the *Rural Digital Opportunity Fund Auction Order*,³⁸ which are summarized below:

- The initial letter of credit must cover the first year of support for the state, at a minimum.³⁹
- The letter(s) of credit must be issued in substantially the same form as set forth in the model letter of credit provided in Appendix C of the *Rural Digital Opportunity Fund Order*.⁴⁰
- The long-form applicant must be the entity that is named in the letter(s) of credit.⁴¹
- The letter(s) of credit must be issued by a qualified bank. The issuing bank eligibility requirements are described in section 54.804(c)(2) of the Commission's rules and in paragraph 107 of the *Rural Digital Opportunity Fund Order*.⁴²
- Before a support recipient can receive its next year's support and each year's support thereafter, it must modify, renew, or obtain a new letter of credit to ensure that its value is consistent with the Commission's rules. The value of the letter of credit must increase each year until it has been verified that the support recipient has met certain service milestones as described in more detail in section 54.804(c)(1) of the Commission's rules.⁴³
- The letter of credit must remain open until the support recipient has certified that it offers the required service to 100% of the Connect America Cost Model (CAM)-determined location total in the state by the end of year six (or WCB's adjusted CAM location count if there are fewer locations) and the Universal Service Administrative Company (USAC) has verified that the build out obligation has been fulfilled.⁴⁴
- A list of common letter of credit errors is available at <https://www.fcc.gov/file/18256/download>.

³⁸ 47 CFR § 54.804(c); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 729-35, 773-77, paras. 96-113, Appx. C.

³⁹ 47 CFR § 54.804(c)(1); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 732, para. 107.

⁴⁰ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 773-77, Appx. C.

⁴¹ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6164, para. 291.

⁴² 47 CFR § 54.804(c)(2); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 732-33, para. 107. WCB also issued guidance announcing that a non-U.S. bank that has a branch office located in New York City and that will accept a letter of credit draw certificate from USAC via overnight courier, in addition to in-person presentations, will be considered qualified to issue letters of credit if the bank also meets the Commission's other non-U.S. bank eligibility requirements. *Wireline Competition Bureau Provides Guidance Regarding the Eligibility of Non-United States Banks Issuing Letters of Credit for Universal Service Competitive Bidding Mechanisms*, WC Docket No. 19-126 et al., Public Notice, 35 FCC Rcd 2804 (WCB 2020).

⁴³ 47 CFR § 54.804(c)(1)(i)-(vii); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 729-31, paras. 98-104.

⁴⁴ 47 CFR § 54.804(c)(1); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 731, para. 103. See also *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 709-12, paras. 45-55 (describing the service milestones and WCB's recalculation of location totals). More information about USAC's verification process is available at: <https://www.usac.org/high-cost/resources/fund-verification-reviews/>.

- **Letter of Credit Bankruptcy Opinion Letter(s)** from outside legal counsel regarding the treatment of the letter(s) of credit or its proceeds in a bankruptcy proceeding.⁴⁵ The letter must clearly state, subject only to customary assumptions, limitations, and qualifications, that, in a proceeding under the Bankruptcy Code, the bankruptcy court would not treat the letter of credit or proceeds of the letter of credit as property of the long-form applicant's bankruptcy estate, or the bankruptcy estate of any other bidder-related entity requesting issuance of the letter of credit, under section 541 of the Bankruptcy Code.⁴⁶

19. Once Commission staff has determined that a long-form application is complete and the long-form applicant is financially and technically qualified, and the letter(s) of credit and accompanying opinion letter(s) have been received and approved, WCB will issue a public notice announcing the authorization of support for the winning bid(s) and directing USAC to begin disbursing support.⁴⁷ USAC will issue a new study area code to each long-form applicant for each state in which it is authorized to receive support. Long-form applicants will be notified of the new study area code prior to the authorization for support along with procedures for disbursing support. Monthly support disbursements will begin shortly after the authorization public notice has been released.

20. If an applicant is not authorized to receive support for a winning bid, it will be in default and subject to forfeiture for that winning bid as described below.

2. Forfeiture in the Event of Default

21. As described in the *Rural Digital Opportunity Fund Order*,⁴⁸ winning bidders or long-form applicants that have been assigned winning bids during the Divide Winning Bids stage will be subject to a forfeiture in the event of a default. A winning bidder or long-form applicant will be considered in default and will be subject to forfeiture if it fails to timely file a long-form application, fails to meet the document submission deadlines, is found ineligible or unqualified to receive Rural Digital Opportunity Fund support, and/or otherwise defaults on its winning bids or is disqualified for any reason prior to the authorization of support. Any such determination shall be final, and a winning bidder or long-form applicant shall have no opportunity to cure through additional submissions, negotiations, or otherwise.

22. A winning bidder or long-form applicant that defaults will be subject to a base forfeiture per violation of \$3,000.⁴⁹ A violation is defined as any form of default with respect to the census block group. In other words, there shall be separate violations for each census block group assigned in a bid.⁵⁰ So that this base forfeiture amount is not disproportionate to the amount of a winning bidder's bid, the Commission has limited the total base forfeiture to 15% of the bidder's total assigned support for the bid for the support term.⁵¹ Notwithstanding this limitation, the total base forfeiture will also be subject to

⁴⁵ 47 CFR § 54.804(c)(3); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6177-78, para. 320; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735, para. 113.

⁴⁶ 11 U.S.C. § 541; 47 CFR § 54.804(c)(3); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735, para. 113.

⁴⁷ 47 CFR § 54.804(b)(6)(vi).

⁴⁸ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735-36, paras. 114-17; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, paras. 321-22.

⁴⁹ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735-36, para. 115; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, para. 322.

⁵⁰ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735, para. 115; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, para. 322.

⁵¹ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 736, para. 117; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, para. 322. This would occur in situations where the dollar amount associated with the bid is low. For example, assume Bidder A bids to serve 100 census block groups for \$100,000 over the support term. We (continued....)

adjustment upward or downward based on the criteria set forth in the Commission's forfeiture guidelines.⁵²

C. General FCC Form 683 Information

23. For both the Divide Winning Bids and long-form application portions of FCC Form 683, the application may be filed at any time after the relevant filing window opens until the filing window closes. Applicants are strongly encouraged to file early and are responsible for allowing adequate time for filing their applications. Applications can be updated or amended multiple times until the relevant filing window closes.

24. **A winning bidder and/or long-form applicant must always click on the CERTIFY & SUBMIT button on the "Certify & Submit" screen to successfully submit its FCC Form 683 and any modifications; otherwise, the application or changes to the application will not be received or reviewed by Commission staff.** If a winning bidder or long-form applicant needs guidance or encounters technical difficulties in filing FCC Form 683, it may contact FCC Auctions Technical Support using the information in the Contact section, below.

D. Maintaining Accuracy of Information

25. Each long-form applicant must make all changes to its information in the Auction Application System using FCC Form 683. With the release of this Public Notice, long-form applicants are no longer required to maintain the accuracy and completeness of information furnished in their FCC Form 183 applications.

26. A long-form applicant will be permitted to make minor modifications to its application after the deadline for submitting applications.⁵³ Minor modifications include correcting typographical errors and supplying non-material information that was inadvertently omitted or not available at the time the application was submitted.⁵⁴ If a long-form applicant makes a major modification to its application, the application will be denied.⁵⁵ In such an event, the long-form applicant will be subject to forfeiture. Major modifications include, but are not limited to, any changes in the ownership of the long-form applicant that constitute an assignment or transfer of control, any changes in the identity of the long-form applicant, or any changes in the required certifications.⁵⁶

E. Public Availability of FCC Form 683 Information

27. Information submitted in FCC Form 683 will generally be publicly available after Commission staff completes its review. Accordingly, a long-form applicant should take care not to include any unnecessary sensitive information, such as Taxpayer Identification Numbers or Social Security Numbers, in its application. However, consistent with the Commission's limited information procedures in place for Auction 904, certain information will be withheld from routine public inspection even after support is authorized. **To ensure that the information described below is afforded such**

(Continued from previous page) _____

would impose a base forfeiture of \$15,000 (15% of \$100,000) because otherwise the base forfeiture would be \$300,000, three times the entire bid amount (\$3,000 x 100 census block groups). In contrast, if Bidder B bids to serve 50 census block groups for \$1,000,000 over the support term, we would impose a base forfeiture of \$150,000 (\$3,000 x 50 census block groups), which is 15% of the total bid.

⁵² See 47 U.S.C. § 503(b)(2)(B); 47 CFR § 1.80(b)(8), note to paragraph (b)(8); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 736, para. 115; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, para. 322.

⁵³ 47 CFR § 54.804(b)(6)(iii).

⁵⁴ *Id.*

⁵⁵ *Id.* § 54.804(b)(6)(iv).

⁵⁶ *Id.*

confidential treatment, a long-form applicant must upload the information to FCC Form 683 using the appropriate attachment “type” as described in the instructions in Attachment C.

28. Information related to a long-form applicant’s detailed technology and system design description, its project funding description, and its letter of credit will be treated as confidential and will be withheld from public inspection.⁵⁷ The Commission will treat long-form applicants that submit this information as having made a request to treat this information as confidential trade secrets and/or commercial information. As such, a long-form applicant need not submit a separate section 0.459 confidentiality request for this information with its FCC Form 683.

29. Moreover, a long-form applicant may request confidential treatment of its audited financial statements directly on FCC Form 683, using an abbreviated process under section 0.459(a)(4) of the Commission’s rules. The applicant need not submit a separate section 0.459 confidentiality request with its FCC Form 683.⁵⁸

30. Nevertheless, if a request for public inspection under section 0.461 is made for the long-form applicant’s audited financial statements, detailed technology and system design description, project funding description, or letter of credit, the long-form applicant will be notified and then must justify the continued confidential treatment of the information if it objects to the disclosure.⁵⁹

31. A long-form applicant may include with its FCC Form 683 a request that any other information submitted in its application not be made routinely available for public inspection following the procedures set forth in section 0.459 of the Commission’s rules.⁶⁰ Requests for confidential treatment of information other than that discussed above will not be routinely granted.

IV. OTHER IMPORTANT INFORMATION

A. Maintaining Prohibition on Certain Communications

32. Section 1.21002 of the Commission’s rules provides that, subject to specified exceptions, after the deadline for filing a short-form application, an applicant “is prohibited from communicating with any other applicant in any manner the substance of its own, or one another’s, or any competing applicant’s bids or bidding strategies, until after the post-auction deadline for winning bidders to submit applications for support.”⁶¹ As explained more fully in the *Auction 904 Procedures Public Notice*, this prohibition took effect as of the short-form application filing deadline, i.e., July 15, 2020, at 6:00 p.m. ET, and extends until the deadline for filing the long-form application portion of FCC Form 683, i.e., **January 29, 2021, at 6:00 p.m. ET.**⁶²

⁵⁷ *Id.* § 0.459; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6130, 6168, 6175, paras. 141 n.325, 303 n.516, & 314 n.542. A long-form applicant’s high-level initial project overview will be made publicly available. *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6167, para. 302. For the Connect America Phase II auction, a winning bidder’s letter of credit from a qualified bank was treated as confidential trade secrets and/or commercial information and thus withheld from routine public inspection. *See Connect America Fund Phase II Auction Support for 962 Winning Bids Ready to Be Authorized; Listed Auction 903 Long-Form Applicants Must Submit Letters of Credit and Legal Counsel’s Opinion Letters by March 13, 2019*, AU Docket No. 17-182 et al., Public Notice, 34 FCC Rcd 955, 956 (WCB/OEA 2019). For the same reasons, we will withhold an applicant’s letter of credit commitment letter, letter of credit, and bankruptcy opinion letter.

⁵⁸ 47 CFR § 0.459(a)(4).

⁵⁹ *Id.* § 0.461

⁶⁰ *Id.* § 0.459.

⁶¹ *Id.* § 1.21002(b).

⁶² *See Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6132, para. 151.

33. **This prohibition applies to all short-form applicants regardless of whether such applicants became qualified bidders or actually bid.**⁶³ We also emphasize that, for purposes of this prohibition, an “applicant” includes the entity filing the application, each entity capable of controlling the applicant, and each entity that may be controlled by the applicant or by an entity capable of controlling the applicant.⁶⁴

34. With the release of this Public Notice, the Commission has made public auction-related information which previously would have been subject to the prohibition on certain communications.⁶⁵ Parties are reminded, however, that “bids or bidding strategies” encompasses more than information about bids submitted during the bidding portion of the auction. How an applicant participates in an auction is subject to the prohibition and includes, for example, a winning bidder filing a long-form application for support.⁶⁶ As noted in the *Auction 904 Procedures Public Notice*, information within the scope of the prohibition includes “subject matters that could convey cost or geographic information related to bidding strategies. Such subject areas include, but are not limited to, management, sales, local marketing agreements, and other transactional agreements.”⁶⁷ We note that proxy bid instructions, which may reflect such information, remain non-public.

35. Moreover, the prohibition of “communicating in any manner” includes public disclosures, private communications, and indirect or implicit communications, as well as express statements of bids and bidding strategies.⁶⁸ Consequently, an applicant must take care to determine whether its auction-related communications may reach another applicant.

B. High-Cost Eligible Telecommunications Carrier Designations

36. As noted above, by Monday, June 7, 2021, the long-form applicant must have obtained from either the relevant state authority or, where such authority lacks jurisdiction, from the Commission, a high-cost ETC designation(s) that covers its winning bid areas. The long-form applicant must submit for each state the required documentation and a certification letter from an officer.⁶⁹ Long-form

⁶³ An entity that submits an application becomes an “applicant” under the rule at the application filing deadline and that status does not change based on subsequent developments. *See, e.g., Star Wireless, LLC v. FCC*, 522 F.3d 469 (D.C. Cir. 2008) (section 1.2105(c) applies to applicants regardless of whether they are qualified to bid). Thus, an auction applicant that does not correct deficiencies in its application, or does not otherwise become qualified, remains an “applicant” for purposes of the rule and remains subject to the prohibition on certain communications until the long-form application filing deadline.

⁶⁴ 47 CFR § 1.21002(a).

⁶⁵ In addition, the combination of publicly available short-form application information and bidding information made available today effectively makes public the information that can be derived from such sources, including the potential assignee(s) of each winning bid. Accordingly, we clarify that the prohibition does not apply to information about the selection of assignees for winning bids in the Divide Winning Bids process.

⁶⁶ 47 CFR § 1.21004; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6133, para. 155 (“communicating, among other things, how an applicant will participate . . . would convey bids or bidding strategies and would thus be prohibited”).

⁶⁷ *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6133, para. 156.

⁶⁸ *Id.*; *see generally Updating Part 1 Competitive Bidding Rules*, WT Docket No. 14-170 et al., Report and Order et al., 30 FCC Rcd 7493, 7577, para. 199 (2015) (explaining that similar section 1.2105(c) language prohibiting communicating bids or bidding strategies “in any manner” bars “communicating bids or bidding information, either directly or indirectly”); *Cascade Access, L.L.C.*, Forfeiture Order, 28 FCC Rcd 141, 144, para. 7 (EB 2013) (rejecting argument that the communication was not prohibited because it did not reveal the “substance” of Cascade’s bids or bidding strategies).

⁶⁹ 47 CFR § 54.804(b)(5); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 316.

applicants subject to state jurisdiction must petition the relevant state commissions for ETC designation and should follow state rules and requirements to apply for designation(s).⁷⁰ Long-form applicants not subject to state jurisdiction must petition the Commission for designation(s) as described in the *ETC Public Notice*.⁷¹ Petitioners for FCC designation do not need to include a list of census blocks with their ETC petition but should certify they will serve all blocks for which the long-form applicant has or will seek an award of support in that state.⁷²

37. In the event a long-form applicant determines that it will be unable to obtain the necessary ETC designations within 180 days, it should upload a petition for waiver of the deadline to its FCC Form 683 and in AU Docket No. 20-34. The Commission has found that it would be appropriate to waive the 180-day timeframe if the long-form applicant is able to demonstrate that it has engaged in good faith efforts to obtain an ETC designation, but the proceeding is not yet complete.⁷³ A waiver of the 180-day deadline would be appropriate if, for example, the applicant (or an associated entity) has an ETC application pending with a state and the state's next scheduled meeting at which it would consider the ETC application will occur after the 180-day window. When considering waivers of the 180-day deadline for obtaining ETC designation, we will presume that an entity acted in good faith if the entity files its ETC application **within 30 days** of the release of this Public Notice.⁷⁴

C. Public Interest Obligations and Annual Reporting Requirements

38. To ensure that Rural Digital Opportunity Fund support meets the Commission's public interest objectives, a long-form applicant that has received notice from the Commission that it is authorized to receive Rural Digital Opportunity Fund support will be subject to a variety of obligations, including service requirements, service milestones, reporting, and record retention requirements.⁷⁵ This includes the requirement that support recipients test and certify compliance with the relevant performance requirements in accordance with the uniform framework that has been adopted for measuring and reporting on the performance of high-cost support recipients' service.⁷⁶

⁷⁰ 47 U.S.C. § 214(e)(2).

⁷¹ *Id.* at § 214(e)(6); *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, Public Notice, WC Docket No. 09-197 et al., 33 FCC Rcd 6696 (WCB 2018) (*ETC Public Notice*). As described in this public notice, the Commission places the burden of proof upon the petitioner seeking a Commission ETC designation to demonstrate that the Commission has jurisdiction. *Id.* at 6696-97. We extend to Auction 904 winners the same waivers of section 54.202 of the Commission's rules for the reasons described in the *ETC Public Notice* and the same presumption that designation will serve the public interest. *See id.* at 6699-6700; 47 CFR § 54.202.

⁷² Petitioners may, in addition to seeking a high-cost designation in winning bid areas, seek a Lifeline-only ETC designation in areas not eligible for high-cost support for the limited purpose of becoming eligible to receive only Lifeline support in such areas. When doing so, they must submit with their ETC application a map or other information delineating these Lifeline-only areas, and other information specifically required by the Commission's Lifeline rules. *See, e.g., Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 09-197 & 10-90, Order, 34 FCC Rcd 10533 (WCB 2019); 47 CFR § 54.202(a)(4)-(6).

⁷³ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 723, para. 81.

⁷⁴ *Id.*

⁷⁵ *See, e.g.,* 47 CFR §§ 54.313, 54.314, 54.316, 54.320, 54.802, 54.805, 54.806; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6082-86, 6127-29, paras. 15-21, 135-39 (providing a high-level summary of the relevant public interest obligations and high-cost ETC obligations).

⁷⁶ 47 CFR § 54.313(a)(6). *See also, CAF Performance Measures Order*, 33 FCC Rcd 6509. Further modifications were made to the performance measures requirements in subsequent reconsideration orders. *See Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, 34 FCC Rcd 8081 (WCB/WTB/OET 2019) (*CAF Performance Measures First Reconsideration Order*); *CAF Performance Measures Second Reconsideration Order*, 34 FCC Rcd 10109.

39. An Auction 904 support recipient will be subject to non-compliance measures if it fails or is unable to meet the service milestones or other service requirements, or fails to fulfill any other term or condition of Rural Digital Opportunity Fund support.⁷⁷ As described in the *Rural Digital Opportunity Fund Order* and the *CAF Performance Measures Order*, these measures will scale with the extent of non-compliance, and include additional reporting, withholding of support, support recovery, and drawing on the support recipient's letter of credit if the support recipient cannot pay back the relevant support by the applicable deadline.⁷⁸ A support recipient may also be subject to other sanctions for non-compliance with the terms and conditions of Rural Digital Opportunity Fund support, including, but not limited to, the Commission's existing enforcement procedures and penalties, reductions in support amounts, potential revocation of ETC designations, and suspension or debarment.⁷⁹

40. We also remind applicants that all Auction 904 support recipients will be subject to the Commission's National Security Supply Chain proceeding, including the rule that "no universal service support may be used to purchase, obtain, maintain, improve, modify, or otherwise support any equipment or services produced or provided by any company posing a national security threat to the integrity of communications networks or the communications supply chain."⁸⁰ The prohibition on using universal service funds applies "to upgrades and maintenance of existing equipment and services."⁸¹

D. Access to the Bidding System

41. The bidding system will remain accessible to Auction 904 qualified bidders until 3:00 p.m. ET on Thursday, December 10, 2020. Bidders should download any files they wish to save from the bidding system before that time.

E. Return of SecurID® Tokens

42. The SecurID® tokens distributed to qualified bidders are tailored to Auction 904 and will not function in future auctions. The Commission will send each bidder, along with the copy of this Public Notice, a pre-addressed, stamped envelope to return its SecurID® tokens. Each bidder should return its SecurID® token(s) to the Commission for recycling.

F. Contact Information

43. For further information, contact:

Technical Support

Electronic Filing
Auction Application System and CAF II Bidding
System (Hardware/Software Issues)

FCC Auctions Technical Support Hotline

(877) 480-3201, option nine; or (202) 414-1250
(202) 414-1255 (TTY)
Hours of service: 8:00 a.m. – 6:00 p.m. ET,
Monday through Friday

Press Information

Anne Veigle, (202) 418-0500

⁷⁷ 47 CFR §§ 54.804(c)(4), 54.320, 54.806.

⁷⁸ *Id.* §§ 54.804(c)(4), 54.320, 54.806; *CAF Performance Measures Order*, 33 FCC Rcd at 6531-33, paras. 60-67; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 713-16, paras. 58-64.

⁷⁹ 47 CFR § 54.320(c), 54.806(b); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 716, para. 63.

⁸⁰ 47 CFR § 54.9(a).

⁸¹ *Protecting Against National Security Threats to the Communication Supply Chain through FCC Programs et al.*, WC Docket No. 18-89 et al., Report and Order et al., 34 FCC Rcd 11423, 11453, para. 77 (2019).

General Universal Service Information**Wireline Competition Bureau,
Telecommunications Access Policy Division**

Alex Minard
Heidi Lankau
Lauren Garry
Ian Forbes
(202) 418-7400

General Auction Information

General Auction Questions
Auction Process and Procedures

FCC Auctions Hotline

(888) 225-5322, option two; or
(717) 338-2868

Auction 904 Information

Post-Auction Rules, Policies, and Regulations

Rural Broadband Auctions Task Force

Michael Janson, (202) 418-0627
Kirk Burgee, (202) 418-1599
Jonathan McCormack, (202) 418-1065
Audra Hale-Maddox, (202) 418-0794

**Office of Economics and Analytics
Auctions Division**

Mark Montano
Daniel Habif
(202) 418-0660

Small Businesses

Additional information for small and
disadvantaged businesses

**Office of Communications Business
Opportunities**

(202) 418-0990
www.fcc.gov/ocbo

Accessible Formats

Braille, large print, electronic files, or
audio format for people with disabilities

Consumer and Governmental Affairs Bureau

(202) 418-0530 or (202) 418-0432 (TTY)
fcc504@fcc.gov

FCC Internet Sites

www.fcc.gov
www.fcc.gov/auction/904

- FCC -

FCC Rural Digital Opportunity Fund Phase I Auction

Attachment A



Auction ID: 904

Winning Bidder Summary

(Sorted by Bidder Name)

Date of Report: 12/07/2020 08:17 AM ET

Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Mountain West Technologies Corporation	0015643182	Wyoming	\$ 141,801.20	690
NBVDs Investment, L.L.C.	0017194986	Oklahoma	\$ 1,655,443.40	2,387
Net Ops Communications, LLC	0025394529	Texas	\$ 69,676.40	1,586
Newport Utilities	0027152438	Tennessee	\$ 159,492.00	59
NexTier Consortium	0029756582	Alabama	\$ 1,368,306.90	4,116
NexTier Consortium	0029756582	Arkansas	\$ 32,255,788.20	10,739
NexTier Consortium	0029756582	Georgia	\$ 161,124.00	281
NexTier Consortium	0029756582	Illinois	\$ 2,646,496.40	815
NexTier Consortium	0029756582	Louisiana	\$ 1,710,200.30	1,639
NexTier Consortium	0029756582	Michigan	\$ 627,072.00	537
NexTier Consortium	0029756582	Mississippi	\$ 45,169,908.90	11,693
NexTier Consortium	0029756582	Missouri	\$ 2,108,576.90	2,011
NexTier Consortium	0029756582	Ohio	\$ 1,081,309.10	7,568
NexTier Consortium	0029756582	Oregon	\$ 11,152,903.10	1,762
NexTier Consortium	0029756582	Pennsylvania	\$ 5,105,375.70	4,460
NexTier Consortium	0029756582	Tennessee	\$ 9,648,243.20	12,895
NexTier Consortium	0029756582	Texas	\$ 3,276,899.00	14,498
NexTier Consortium	0029756582	Virginia	\$ 9,975,489.60	7,595

EXHIBIT F

CENSUS BLOCKS

Census Block	County
390719551003000	Highland
390719551003001	Highland
390719551003002	Highland
390719551003003	Highland
390719551003004	Highland
390719551003006	Highland
390719551003007	Highland
390719551003008	Highland
390719551003009	Highland
390719551003010	Highland
390719551003011	Highland
390719551003012	Highland
390719551003014	Highland
390719551003015	Highland
390719551003016	Highland
390719551003017	Highland
390719551003018	Highland
390719551003019	Highland
390719551003020	Highland
390719551003021	Highland
390719551003023	Highland
390719551003024	Highland
390719551003026	Highland
390719551003027	Highland
390719551003028	Highland
390719551003030	Highland
390719551003031	Highland
390719551003032	Highland
390719551003033	Highland
390719551003034	Highland
390719551003035	Highland
390719551003036	Highland
390719551003038	Highland
390719551003039	Highland
390719551003040	Highland
390719551003043	Highland
390719551003044	Highland
390719551003046	Highland

390719551003047	Highland
390719551003048	Highland
390719551003049	Highland
390719551003050	Highland
390719551003052	Highland
390719551003053	Highland
390719551003054	Highland
390719551003055	Highland
390719551003056	Highland
390719551003057	Highland
390719551003058	Highland
390719551003060	Highland
390719551003061	Highland
390719551003062	Highland
390719551003065	Highland
390719551003066	Highland
390719551003067	Highland
390719551003069	Highland
390719551003071	Highland
390719551003072	Highland
390719551003074	Highland
390719551003076	Highland
390719551003077	Highland
390719551003079	Highland
390719551003080	Highland
390719551003082	Highland
390719551003084	Highland
390719551003092	Highland
390719551003093	Highland
390719551003094	Highland
390719551003095	Highland
390719551003096	Highland
390719551003098	Highland
390719551003102	Highland
390719551003103	Highland
390719551003104	Highland
390719551003107	Highland
390719551003111	Highland
390719551003112	Highland

390719551004000	Highland
390719551004001	Highland
390719551004002	Highland
390719551004003	Highland
390719551004004	Highland
390719551004005	Highland
390719551004008	Highland
390719551004011	Highland
390719551004014	Highland
390719551004016	Highland
390719551004017	Highland
390719551004019	Highland
390719551004020	Highland
390719551004023	Highland
390719551004027	Highland
390719551004029	Highland
390719551004030	Highland
390719551004032	Highland
390719551004035	Highland
390719551004036	Highland
390719551004037	Highland
390719551004038	Highland
390719551004039	Highland
390719551004040	Highland
390719551004041	Highland
390719551004042	Highland
390719551004043	Highland
390719551004045	Highland
390719551004046	Highland
390719551004047	Highland
390719551004048	Highland
390719551004050	Highland
390719551004051	Highland
390719551004052	Highland
390719551004053	Highland
390719551004054	Highland
390719551004055	Highland
390719551004057	Highland
390719551004058	Highland

390719551004059	Highland
390719551004060	Highland
390719551004061	Highland
390719551004062	Highland
390719551004063	Highland
390719551004064	Highland
390719551004065	Highland
390719551004067	Highland
390719551004068	Highland
390719551004069	Highland
390719551004070	Highland
390719551004071	Highland
390719551004072	Highland
390719551004073	Highland
390719551004074	Highland
390719551004075	Highland
390719551004076	Highland
390719551004077	Highland
390719551004078	Highland
390719551004079	Highland
390719551004081	Highland
390719551004082	Highland
390719551004083	Highland
390719551004086	Highland
390719551004087	Highland
390719551004088	Highland
390719551004089	Highland
390719551004090	Highland
390719551004091	Highland
390719551004093	Highland
390719551004094	Highland
390719551004096	Highland
390719551004098	Highland
390719551004099	Highland
390719551004100	Highland
390719551004101	Highland
390719551004104	Highland
390719551004105	Highland
390719551004106	Highland
390017701001000	Adams
390017701001002	Adams
390017701001003	Adams
390017701001004	Adams

390017701001005	Adams
390017701001007	Adams
390017701001008	Adams
390017701001010	Adams
390017701001011	Adams
390017701001012	Adams
390017701001013	Adams
390017701001014	Adams
390017701001019	Adams
390017701001021	Adams
390017701001022	Adams
390017701001023	Adams
390017701001024	Adams
390017701001025	Adams
390017701001026	Adams
390017701001027	Adams
390017701001028	Adams
390017701001031	Adams
390017701001032	Adams
390017701001033	Adams
390017701001035	Adams
390017701001036	Adams
390017701001038	Adams
390017701001039	Adams
390017701001042	Adams
390017701001043	Adams
390017701001044	Adams
390017701001047	Adams
390017701001048	Adams
390017701001052	Adams
390017701001054	Adams
390017701001056	Adams
390017701001057	Adams
390017701001058	Adams
390017701001059	Adams
390017701001062	Adams
390017701001063	Adams
390017701001066	Adams
390017701001068	Adams
390017701001070	Adams
390017701001071	Adams
390017701001073	Adams
390017701001076	Adams

390017701001082	Adams
390017701001084	Adams
390017701001085	Adams
390017701001086	Adams
390017701001096	Adams
390017701001097	Adams
390017701001098	Adams
390017701003005	Adams
390017701003007	Adams
390017701003008	Adams
390017701003052	Adams
390017701004001	Adams
390017701004002	Adams
390017701004006	Adams
390017701004007	Adams
390017701004009	Adams
390017701004010	Adams
390017701004012	Adams
390017701004014	Adams
390017701004024	Adams
390017701004025	Adams
390017701004027	Adams
390017701004029	Adams
390017701004030	Adams
390017701004031	Adams
390017701004032	Adams
390017701004038	Adams
390017701004039	Adams
390017701004044	Adams
390017701004045	Adams
390017701004049	Adams
390017701004053	Adams
390017701004055	Adams
390017701004056	Adams
390017701004058	Adams
390017701004063	Adams
390017701004064	Adams
390017701004065	Adams
390017701004070	Adams
390017701004071	Adams
390017701004072	Adams
390017701004073	Adams
390017701004075	Adams

390017705001102	Adams
390017705001103	Adams
390017705001104	Adams
390017705001105	Adams
390017705001108	Adams
390017705003000	Adams
390017705003001	Adams
390017705003002	Adams
390017705003004	Adams
390017705003005	Adams
390017705003006	Adams
390017705003009	Adams
390017705003010	Adams
390017705003011	Adams
390017705003012	Adams
390017705003013	Adams
390017705003014	Adams
390017705003016	Adams
390017705003018	Adams
390017705003020	Adams
390017705003021	Adams
390017705003022	Adams
390017705003024	Adams
390017705003027	Adams
390017705003030	Adams
390017705003031	Adams
390017705003032	Adams
390017705003035	Adams
390017705003039	Adams
390017705003040	Adams
390017705003049	Adams
390017705003051	Adams
390017705003056	Adams
390017705003061	Adams
390017705003062	Adams
390017705003069	Adams
390017705003072	Adams
390017705003073	Adams
390017705003074	Adams
390017705003075	Adams
390017705003079	Adams
390017705003082	Adams
390017705003083	Adams

390017705003084	Adams
390017705003085	Adams
390017705003087	Adams
390017706001002	Adams
390017706001003	Adams
390017706001004	Adams
390017706001005	Adams
390017706001007	Adams
390017706001008	Adams
390017706001012	Adams
390017706001013	Adams
390017706001016	Adams
390017706001020	Adams
390017706001023	Adams
390017706001033	Adams
390017706001035	Adams
390017706001036	Adams
390017706001037	Adams
390017706001040	Adams
390017706001042	Adams
390017706001043	Adams
390017706001044	Adams
390017706001046	Adams
390017706001047	Adams
391319527001030	Pike
391319527001033	Pike
391319527001034	Pike
391319527001035	Pike
391319527001042	Pike
391319527001049	Pike
391319527001050	Pike
391319527001053	Pike
391319527001054	Pike
391319527001055	Pike
391319527001056	Pike
391319527001058	Pike
391319527001059	Pike
391319527001062	Pike
391319527001063	Pike
391319527001064	Pike
391319527001067	Pike
391319527001071	Pike
391319527001072	Pike

391319527001073	Pike
391319527001074	Pike
391319527001075	Pike
391319527001076	Pike
391319527001078	Pike
391319527001079	Pike
391319527001080	Pike
391319527003020	Pike
391319527003023	Pike
391319527003024	Pike
391319527003025	Pike
391319527003026	Pike
391319527003034	Pike
391319527003035	Pike
391319527003036	Pike
391319527003037	Pike
391319527003038	Pike
391319527003039	Pike
391319527003040	Pike
391319527003041	Pike
391319527003042	Pike
391319527003052	Pike
391319527003053	Pike
391319527003054	Pike
391319527003055	Pike
391319527003057	Pike
391319527003058	Pike
391319527003059	Pike
391319527003060	Pike
391319527003061	Pike
391319527003079	Pike
391319527003080	Pike
391319527003081	Pike
391319527003084	Pike
391319527003085	Pike
391319527003088	Pike
391319527003093	Pike
391319527003114	Pike
391319527003119	Pike
391319527003123	Pike
391319527003127	Pike
391319527003131	Pike
391319527003140	Pike

391450023004089	Scioto
391450023004090	Scioto
391450023004091	Scioto
391450023004092	Scioto
391450023004093	Scioto
391450023004100	Scioto
391450023004101	Scioto
391450023004102	Scioto
391450023004103	Scioto
391450023004106	Scioto
391450023004107	Scioto
391450023004110	Scioto
391450023004111	Scioto
391450023004112	Scioto
391450023004117	Scioto
391450023004118	Scioto

391450023004119	Scioto
391450023004120	Scioto
391450023004123	Scioto
391450023004124	Scioto
391450023004129	Scioto
391450023004131	Scioto
391450023004132	Scioto
391450023004133	Scioto
391450023004134	Scioto
391450023004135	Scioto
391450023004140	Scioto
391450023004141	Scioto
391450023004147	Scioto
391450023004148	Scioto
391450023004149	Scioto
391450023004156	Scioto

391450040001014	Scioto
391450040001020	Scioto
391450040001024	Scioto
391450040001025	Scioto
391450040001026	Scioto
391450040001027	Scioto
391450040001028	Scioto
391450040001029	Scioto
391450040001030	Scioto
391450040001032	Scioto
391450040001033	Scioto
391450040001034	Scioto
391450040001036	Scioto
391450040001038	Scioto

EXHIBIT G
CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA
STATE OF OHIO
OFFICE OF THE SECRETARY OF STATE

I, Frank LaRose, do hereby certify that I am the duly elected, qualified and present acting Secretary of State for the State of Ohio, and as such have custody of the records of Ohio and Foreign business entities; that said records show SOUTHERN OHIO COMMUNICATION SERVICES, INC., an Ohio corporation, Charter No. 505640, having its principal location in Waverly, County of Pike, was incorporated on October 13, 1977 and is currently in GOOD STANDING upon the records of this office.



*Witness my hand and the seal of the
Secretary of State at Columbus, Ohio
this 28th day of December, A.D.
2020.*

A handwritten signature in blue ink, appearing to read "Frank LaRose".

Ohio Secretary of State

Validation Number: 202036303860

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/6/2021 11:21:48 AM

in

Case No(s). 21-0024-TP-UNC

Summary: Application In the Matter of the Application of Southern Ohio Communications Services Inc. Petition for Designation as a High-Cost Rural Competitive Eligible Telecommunications Carrier electronically filed by Ms. Rebecca Goldman on behalf of Southern Ohio Communications Services Inc.