

*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 Armstrong	)	TRF Docket No. 90-9327-TP-TRF
Telecommunications, Inc. Petition for Designation as a	)	Case No. -____-TP-UNC
High-Cost Rural Competitive Eligible	)	<b>Note: Unless you have reserved a Case No., leave the "Case</b>
Telecommunications Carrier.	)	<b>No." field BLANK.</b>

Name of Applicant: Armstrong Telecommunications, Inc.  
DBA(s) of Applicant: \_\_\_\_\_  
Address of Applicant: One Armstrong Place, Butler, PA 16001  
Applicant's Web Address: www.agoc.com  
Contact Person(s): Jerry Weikle  
Contact Person's Email Address: jweikle@windstream.net

Phone: (704)699-9451

**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 lines;
- ☐ (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:

Included	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"><li>• Estimate the specific areas where the improvements will be made; and</li><li>• Estimate the population that will be served as a result of the improvements.</li></ul>
<input checked="" type="checkbox"/>	Exhibit B	Demonstrate the ability to remain functional in emergency situations, including a demonstration that the carrier: <ul style="list-style-type: none"><li>• has a reasonable amount of back-up power to ensure functionality without an external power source;</li><li>• is able to reroute traffic around damaged facilities; and</li><li>• is capable is managing traffic spikes resulting from emergency situations.</li></ul>
<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.

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#### AFFIDAVIT

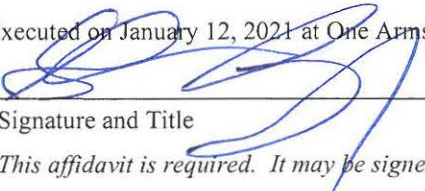
##### *Compliance with Commission Rules*

I, Shawn Beqaj, am an officer/agent of the applicant corporation, Armstrong Telecommunications, 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 12, 2021 at One Armstrong Place, Butler, PA

  
\*Signature and Title

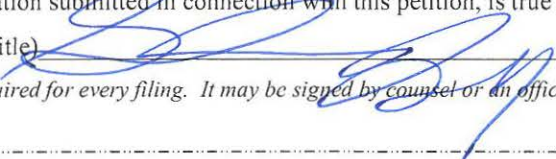
1/12/21  
Date

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

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#### VERIFICATION

I, Shawn Beqaj, 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)

(Date) 1/12/21

*\*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.*

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**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**

## **Exhibit A**

### **Five-Year Plan**

On December 7, 2020, the Federal Communications Commission (“FCC”) released a Public Notice, *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes*, AU Docket No. 20-34, WC Docket No. 19-126, WC Docket No. 10-90, (DA 20-1422). In Footnote 71, the FCC waived the requirement for RDOF winning bidders that are not subject to state jurisdiction to submit five-year plans. Discussions with Staff have indicated that the Public Utilities Commission of Ohio is following FCC rules. Armstrong Telecommunications, Inc. respectfully requests a waiver by the Public Utilities Commission of Ohio to provide a five-year plan.

## **Exhibit B**

### **Emergency Functionality**

#### **ABILITY TO FUNCTION IN EMERGENCY SITUATIONS**

##### ***Voice Network***

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.202(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) Armstrong Telecommunications, Inc. (“Armstrong”) meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Armstrong’s central office by use of a generator and batteries that provide to provide emergency power. Armstrong has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. Armstrong also has proper staff in place to repair any fiber cuts in a timely manner. Armstrong has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. Armstrong has developed and trained its staff on network preparedness plans in case of emergency situations. Armstrong is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

##### ***Broadband Network***

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.202(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2)

Armstrong Telecommunications, Inc. (“Armstrong”) meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to Armstrong central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power that is also used to provide service to the broadband network. In addition, Armstrong field electronics have 8 to 12 hours of back-up power by use of generators and batteries. Armstrong has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. Armstrong also has proper staff in place to repair any fiber cuts in a timely manner. Armstrong has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. Armstrong has developed and trained its staff on network preparedness plans in case of emergency situations.

## **Exhibit C**

### **Public Interest Standard**

#### **DESIGNATION OF ARMSTRONG AS AN ETC IS IN THE PUBLIC INTEREST**

Designation of Armstrong as an ETC will affirmatively serve the public interest.

Armstrong will be offering both voice and high speed broadband Internet access services to customers in high cost areas. These locations were awarded to Armstrong through the FCC's RDOF Auction to deploy broadband services to customers that do not currently have access to high speed broadband Internet access services.

The ETC designation will further serve the public interest because it will allow Armstrong to meet provisions to accept RDOF funding to serve customers in Ohio. Armstrong takes its service commitment seriously and does so proudly.

## **Exhibit D**

### **Advertising Language**

#### **Bill Message:**

##### **Armstrong Offers Lifeline Services**

Armstrong offers a program to help low-income residential customers. Lifeline is a Federal government assistance program. If you are a low-income, residential customer you may qualify for a \$9.25/month discount off your internet service or \$5.25/month discount off your telephone service. This benefit is limited to one discount per household and is non-transferable.

You qualify for Lifeline if you are in one of these programs: Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP), Medicaid, Veteran or Survivor's Pension Benefit or Federal Public Housing Assistance OR your yearly income is at or below 135% of the Federal Poverty Guidelines.

For more information, visit us online at <https://armstrongonewire.com/Support/Billing/Articles/SpecialServices>, contact Armstrong at 877-486-4666, or email us at [info@zoominternet.net](mailto:info@zoominternet.net). For more information on Lifeline visit the Universal Service Administrative Company (USAC) at [www.lifelinesupport.org](http://www.lifelinesupport.org).



**BEFORE THE PUBLIC UTILITIES  
COMMISSION OF OHIO**

In the Matter of	)	
	)	
Application of Armstrong Telecommunications,	)	
Inc. For Designation As An	)	CASE NO. _____
Eligible Telecommunications Carrier	)	

**APPLICATION OF ARMSTRONG TELECOMMUNICATIONS, INC. FOR  
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

Armstrong Telecommunications, Inc. (“Armstrong”) hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) to the Public Utilities Commission of Ohio (“PUCO”). This application is submitted pursuant to Section 214(e)(2) of the federal Communications Act of 1934, as amended (“the Act”),<sup>1</sup> Sections 54.101 through 54.422 of the Rules of the Federal Communications Commission (“FCC”),<sup>2</sup> and the Rules 4901:1-6-09 of the Ohio Administrative Code (“OAC”). Armstrong requests that PUCO grant this Application so that Armstrong will qualify to receive federal universal service fund (“USF”) support.

**I. BACKGROUND**

1. Armstrong was granted a Certificate of Public Convenience and Necessity on Certificate Number 90-6127 issued on June 12, 2003 in Case No. 03-1154-TP-ACE. Armstrong does operate in five other states, Kentucky, Maryland, New York, Pennsylvania, West Virginia. Armstrong has not applied for ETC status before now. Armstrong participated in the recent FCC Rural Digital Opportunity Fund (“RDOF”) auction. Armstrong has been awarded funding to serve assigned areas. ETC status is required for Armstrong to receive RDOF funding.

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101-54.422.

2. All correspondence, communications, notices, and decisions related to this

Application should be directed to:

Shawn Beqaj  
Vice President Regulatory Policy & Interconnection  
Armstrong Telecommunications, Inc.  
One Armstrong Place  
Butler, PA 16001  
(724) 256-8092  
sbeqaj@agoc.com

## **II. ETC DESIGNATION REQUESTED**

3. Section 214(e)(2) of the Act allows the PUCO, upon request and consistent with the public interest, to designate a common carrier as an ETC. It is required that a common carrier meet certain conditions to become designated as an ETC. The requirements are that the requesting carrier must (i) offer services that are supported by federal universal service support mechanisms; and (ii) advertises the availability of such services. A common carrier designated as an ETC shall be eligible to receive universal support.

4. Armstrong seeks ETC certification in order to qualify for available federal high cost USF for providing designated services in high cost areas. Armstrong does not plan to serve any Tribal areas. Designating Armstrong as an ETC will serve the public interest.

## **III. ETC SERVICE REQUIREMENTS TO BE MET**

5. Armstrong will offer the services that are supported by the Federal universal support mechanisms noted in Section 254(c) and 47 C.F.R. § 54.101(a). These services are noted below:

- a) Voice grade access to the public switched telephone network (“PSTN”). “Voice grade access” is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice

communications including receiving a signal indicating there is an incoming call. Armstrong is able to perform these functions.

- b) Local usage. As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. Armstrong's service will include unlimited local usage that allows customers to originate and terminate calls within the local calling area without incurring toll charges;
- c) Access to emergency services. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems. Armstrong will provide these services.
- d) Toll limitation for qualifying low-income consumers. Toll Blocking allows customers to block the completion of outgoing toll calls. Toll Control allows the customer to limit the dollar amount of toll charges a customer can incur during a billing period. Armstrong will offer both Toll Blocking and Toll Control options to customers.
- e) Broadband Internet access. Armstrong will offer high speed broadband Internet access to customers.

6. Armstrong will provide the supported services listed above with its own facilities or with a combination of its own facilities and resale of another carrier's services in accordance with the requirement in 47 C.F.R. § 54.201(d)(1). Armstrong will advertise the availability of the supported services listed above to customers in accordance with FCC rules by using media of general distribution to the general public in accordance with the requirement in 47 C.F.R. § 54.201(d)(2).

#### **IV. SERVICE AREA**

7. Armstrong requests ETC designation to correspond to certain Census Blocks in the State. See Attachment A for a list of the Census Block Groups awarded in in the RDOF auction.

#### **V. ADDITIONAL ETC REQUIREMENTS**

8. Armstrong understands there will be additional requirements than those listed above placed upon it as an ETC and is prepared to satisfy them. Armstrong will comply with the following requirements:

- a) Service Requirements – 47 C.F.R. § 54.202(a)(1)(i). Armstrong commits to comply with service requirements that are applicable to the support received.
- b) Service Requirements – 47 C.F.R. § 54.202(a)(1)(ii). Armstrong commits to comply with the requirement to provide a five-year network improvement plan as well as annual updates as required. The FCC rescinded its requirements for five-year plans for RDOF winning bidders that are not subject to state jurisdiction to submit five-year plans. Discussions with Staff have indicated that PUCO is following FCC rules. Armstrong Telecommunications, Inc. respectfully requests a waiver by PUCO to provide a five-year plan.
- c) Emergency Functionality – 47 C.F.R. § 54.202(a)(2). Armstrong is positioned to provide service during times of emergencies. Armstrong maintains sufficient back up power to ensure its service is functional without a commercial power source. Armstrong is able to reroute traffic around damaged facilities and is also able to manage traffic spikes that result from emergency situations.
- d) Consumer Protection and Service Quality Standards – 47 C.F.R. § 54.202(a)(3). Armstrong will comply with all applicable state and federal requirements for

service quality and consumer protection.

- e) Financial and Technical Capability – 47 C.F.R. § 54.202(a)(4). Armstrong was granted a CPCN by PUCO in Case No. 03-1154-TP-ACE. Armstrong submits that its certification and ability to comply with PUCO requirements is adequate proof of sufficient financial and technical capability today. In addition, Armstrong proved its financial and technical ability in its application to the FCC in order to participate in the RDOF Auction.

## **VI. DESIGNATION OF ARMSTRONG AS AN ETC IS IN THE PUBLIC INTEREST**

9. PUCO designating Armstrong as an ETC will affirmatively serve the public interest. Armstrong will be offering both voice and high speed broadband Internet access services to customers in high cost areas. These customers do not currently have access to high speed broadband Internet access services.

10. The ETC designation will further serve the public interest because it will allow Armstrong to meet provisions to accept RDOF funding. Armstrong takes its service commitment seriously and does so proudly.

## VII. REQUESTED ACTION

11. Armstrong requests that PUCO find it to be in the public interest for Armstrong to be designated as an ETC and to grant this application.

Respectfully submitted,



Shawn Beqaj  
Vice President Regulatory Policy & Interconnection  
Armstrong Telecommunications, Inc.  
One Armstrong Place  
Butler, PA 16001  
(724) 256-8092  
sbeqaj@agoc.com

January 12, 2021

Attachments

## VERIFICATION

### COMMONWEALTH OF PENNSYLVANIA COUNTY OF ALLEGHENY

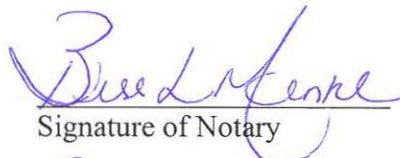
BEFORE ME, the undersigned authority, appeared Shawn Beqaj, who deposed and said: My name is Shawn Beqaj. I am employed by Armstrong Telecommunications, Inc. as Vice President Regulatory Policy & Interconnection. I am an officer of the Company and am authorized to give this verification on behalf of the Company. This verification is being given to state that I have read the foregoing Application for ETC Designation and that I confirm the statements made herein are true to the best of my knowledge and belief.



Shawn Beqaj  
Vice President Regulatory Policy & Interconnection

Subscribed and sworn to before me this 12th day January, 2021.

Commonwealth of Pennsylvania - Notary Seal  
Bess L. Mentel, Notary Public  
Butler County  
My commission expires May 6, 2023  
Commission number 1350222  
Member, Pennsylvania Association of Notaries



Signature of Notary  
Bess L. Mentel  
Printed Name of Notary

My Commission Expires May 6, 2023

## Attachment A

Armstrong Telecommunications, Inc.  
Awarded RDOF Areas

State	County	Census ID	State	County	Census ID
OH	Lawrence	390870512006	OH	Morrow	391179651001
OH	Lawrence	390870512006	OH	Morrow	391179651001
OH	Lawrence	390870512006	OH	Morrow	391179651001
OH	Lawrence	390870512006	OH	Morrow	391179651001
OH	Lawrence	390870512006	OH	Morrow	391179651001
OH	Lawrence	390870512006	OH	Morrow	391179651001
OH	Lawrence	390870512006	OH	Morrow	391179651001
OH	Mahoning	390998103002	OH	Morrow	391179651001
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OH	Mahoning	390998103002	OH	Morrow	391179651001
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OH	Mahoning	390998129003	OH	Morrow	391179651001
OH	Mahoning	390998129003	OH	Morrow	391179652005
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OH	Morrow	391179651001	OH	Trumbull	391559333023
OH	Morrow	391179651001	OH	Trumbull	391559333023
OH	Morrow	391179651001	OH	Wayne	391690031002



**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**1/14/2021 2:50:19 PM**

**in**

**Case No(s). 21-0052-TP-UNC**

Summary: Application Application of Armstrong Telecommunications, Inc. Petition for Designation as a High-Cost Rural Competitive Eligible Telecommunications Carrier electronically filed by Mr. Jerry Weikle on behalf of Armstrong Telecommunications, Inc.