

Ronald L. Williams, ISB #3034
Williams Bradbury, P.C.
802 W. Bannock Street
Suite LP 100
Boise, ID 83702
(208) 344-6633
ron@williamsbradbury.com

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IDAHO PUBLIC
UTILITIES COMMISSION

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202-862-8900 (telephone)
212-269-5420 (facsimile)
ckiser@cahill.com
acollins@cahill.com

**Before the
IDAHO PUBLIC UTILITIES COMMISSION**

In the Matter of)

Application of Cable One VoIP LLC)
for Designation as an Eligible)
Telecommunications Carrier in the State of)
Idaho to Receive Rural Digital Opportunity)
Fund (Auction 904) Support for Voice and)
Broadband Services and to Receive Federal)
Lifeline Support)

Case No. PAB-T-21-01

APPLICATION

**APPLICATION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF IDAHO TO
RECEIVE RURAL DIGITAL OPPORTUNITY FUND (AUCTION 904)
SUPPORT FOR VOICE AND BROADBAND SERVICES
AND TO RECEIVE FEDERAL LIFELINE SUPPORT**

Cable One VoIP LLC (the "Company"), by its attorneys, and pursuant to Section
214(e)(2)¹ of the federal Communications Act of 1934, as amended (the "federal Act"), the rules

¹ 47 U.S.C. § 214(e)(2).

and regulations of the Federal Communications Commission (“FCC”),² Idaho statutes,³ and the requirements set forth in Idaho Public Utilities Commission (“Commission”) Order No. 29841,⁴ hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”). The Company seeks ETC designation to receive (1) Rural Digital Opportunity Fund (“RDOF”) support for the provision of voice and broadband services in certain Census Block Groups and (2) federal Lifeline-only support in other geographic areas of Idaho (collectively, the “Designated Service Area” as set forth in Exhibit 1).

The Company’s parent, Cable One, Inc. (“Cable One”), was a member of a consortium that was selected as a winning bidder in the FCC’s RDOF auction (Auction 904). The Company’s receipt of RDOF funding is conditioned upon the Company obtaining designation as an ETC in the RDOF portions of the Designated Service Area, and providing evidence of such designation to the FCC no later than June 7, 2021. In addition to seeking ETC designation for purposes of RDOF funding, entities also may seek Lifeline-only ETC designation in areas not eligible for high-cost support for the limited purpose of becoming eligible to receive Lifeline support (although recognizing the ETC will be obligated to provide Lifeline services throughout the entire designated area).⁵

² 47 C.F.R. §§ 54.201, 54.202; *see also* AU Docket No. 20-34, *et al.*, *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021*; DA 20-1422 (rel. Dec. 7, 2020) (“Public Notice”); *Lifeline and Link Up Reform and Modernization; et al.*, 27 FCC Rcd 6656 (2012) (“Lifeline Reform Order”).

³ Idaho Stat. § 62-610D.

⁴ Case No. WST-T-05-1, *The Application of WWC Holding Co., Inc. dba Cellular-One Seeking Designation as an Eligible Telecommunications Carrier that may Receive Federal Universal Service Support*, Order No. 29841 (Aug. 4, 2005) (“ETC Order”).

⁵ *Public Notice* at n.72; *see also* *Wireline Competition Bureau Seeks Comment on Petitions for Designation as an Eligible Telecommunications Carrier for the Purpose of Becoming Eligible to Receive Connect America Fund Phase II Auction Support*, 33 FCC Rcd 9764 (2018) (“Recipients of high-cost support, including recipients of CAF support awarded pursuant to Auction 903, must offer the Lifeline discount on all qualifying services in areas where an ETC receives high cost support, deploy a network capable of delivering service that meets the Lifeline program’s minimum service standards, and commercially offer such service pursuant to its high-cost obligation.”).

As demonstrated herein, the Company meets all the statutory and regulatory requirements for designation as an ETC in the State of Idaho. Accordingly, the Company respectfully requests the Commission grant it ETC status in the Designated Service Area on an expedited basis prior to the June 7, 2021 FCC deadline.

In support of this Application, the Company states as follows:

BACKGROUND

1. The Company is a Delaware limited liability company with a principal place of business located at 210 E. Earll Drive, Phoenix, Arizona 85012. The Company is registered with the Idaho Secretary of State to conduct business in the state as shown in **Exhibit 2**. The Company will operate under the DBA name of “Sparklight” in Idaho, which also has been registered with the Idaho Secretary of State as reflected in **Exhibit 2**. Attached as **Exhibit 3** is a current list of the Company’s officers, along with relevant biographical information.

2. The Company currently offers interconnected Voice over Internet Protocol (“VoIP”) services in the state of Arizona. The Company has never been denied ETC designation by any state commission or by the FCC.

3. The Company is a wholly owned subsidiary of Cable One, a publicly traded Delaware corporation (NYSE: CABO), and Cable One serves as the sole member of the Company. Cable One and its subsidiaries provide cable/video, Internet access, broadband, and voice services in 21 states, including Idaho.⁶ Other subsidiaries of Cable One also hold ETC designation in the states of Illinois, Missouri, and Oklahoma.

4. In January 2020, the FCC adopted the framework and rules for Phase I of the RDOF auction (Auction 904) to connect millions of rural homes and small businesses to fixed

⁶ See, e.g., Case No. GNR-T-20-11, *Cable One, Inc.’s Application for a 2019 Investment Tax Credit for Installing Qualifying Broadband Equipment*, Order No. 34758 (Aug. 21, 2020).

high-speed broadband networks.⁷ The FCC designed Phase I of the auction to award up to \$16 billion over 10 years to service providers that commit to offer voice and broadband services to fixed locations in eligible unserved high-cost census block groups. The framework for the RDOF builds upon the FCC's successful Connect America Fund Phase II (CAF-II) auction that was completed in 2018.⁸

5. The Company's parent, Cable One, participated in Auction 904 as a member of the Wisper-CABO 904 Consortium (the "Consortium"). On December 7, 2020, the FCC issued the *Public Notice* announcing the results of Auction 904, and the Consortium was the winning bidder in numerous states, including Idaho.⁹ Pursuant to the FCC's process for distributing winning bids among related entities,¹⁰ the Consortium assigned Cable One (the parent of the Company) as the entity to receive RDOF support for the winning bids in the state of Idaho. The Company will be designated as the entity to fulfill the public interest obligations associated with receiving RDOF support for Idaho in the long-form application (FCC Form 683) to be filed with the FCC.

6. In addition to announcing the winning bidders, the FCC's *Public Notice* also established several deadlines in connection with Auction 904. Relevant to this Application, the FCC requires the Company to provide documentation to the FCC no later than 6:00pm Eastern on June 7, 2021 showing the Company has been designated as a high-cost ETC for the census block groups the Company will receive RDOF support.¹¹ An officer of the Company also is

⁷ *Rural Digital Opportunity Fund, et al.*, 35 FCC Rcd 686 (2020) ("*RDOF Order*").

⁸ The Commission conducted at least two ETC designation proceedings in connection with the CAF-II auction. *See, e.g.*, Case Nos. NEW-T-18-01 and VCS-T-18-01.

⁹ *Public Notice*, Attachment A at 29-30.

¹⁰ *Public Notice* ¶¶ 9-14.

¹¹ *Public Notice* ¶ 17.

required to certify to the FCC on that date that the ETC designation covers all of the census block groups for which the Company will receive RDOF support.

7. Pleadings, orders, notices and other correspondence filed in this matter should be served upon:

Ronald Williams
Williams Bradbury, P.C.
802 W. Bannock Street
Suite LP 100
Boise, ID 83702
(208) 344-6633
ron@williamsbradbury.com

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202-862-8900 (telephone)
212-269-5420 (facsimile)
ckiser@cahill.com
acollins@cahill.com

The above-referenced individuals agree to receive all Commission notices and orders regarding this proceeding via electronic mail.

INFORMATION REQUIRED UNDER FCC RULES AND IDAHO LAW

8. Section 214(e)(1) of the federal Act, the FCC's rules, Idaho Code § 62-610D(3)(a), and the Commission's *ETC Order* set forth certain requirements for ETC designation in Idaho.¹² The Company meets each of these requirements.

9. FCC Rule 54.201(c); FCC Rule 54.202(b); ETC Order, Appendix Section A.4.
An ETC applicant must demonstrate the ETC designation is consistent with the public interest, convenience, and necessity, and in the case of an area served by a rural telephone company,

¹² 47 U.S.C. § 214(e)(1); 47 C.F.R. §§ 54.201, 54.202; Idaho Code § 62-610D(3)(a); *ETC Order*, Appendix.

demonstrate the public interest will be met by an additional designation. In evaluating the public interest element, the Commission generally has considered two factors: (1) whether the entity contributes to state assistance programs; and (2) whether the designation is sought for only part of a rural telephone company's study area, thus leaving some (perhaps less profitable) customers without service (*i.e.*, cream skimming).¹³

10. Designation of the Company as an ETC will serve the public interest, convenience, and necessity. ETC designation will permit the Company to use RDOF support to offer voice and broadband services in the Designated Service Area, which consists of unserved, high-cost areas of Idaho, and to provide Lifeline services to low-income consumers in other areas of Idaho. The Company will invest in facilities and equipment in these areas. This planned investment and deployment in the Designated Service Area will further the goals of the Commission and the FCC by expanding the reach of digital connectivity to promote economic growth in rural areas and ensure quality communications services are available at "just, reasonable, and affordable rates."¹⁴ As the FCC has observed, "an important goal of the [federal] Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."¹⁵

11. The Company commits to participate in applicable Idaho assistance programs upon approval and commencement of its business operations in Idaho. The Company's participation in such Idaho programs also advances the public interest.

12. Finally, the Company is not engaged in "cream skimming." To the Company's

¹³ See, e.g., Order No. 33002 at 2-3; Order No. 33226 at 3.

¹⁴ 47 U.S.C. § 254(b)(1).

¹⁵ *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

knowledge, there is no rural telephone company offering eligible broadband service in the RDOF portions of the Designated Service Area because only “unserved” Census Block Groups were included in Auction 904. In addition, because the Company is requesting ETC designation for entire census block groups, no cream skimming analysis is required.

13. FCC Rule 54.201(d); ETC Order, Appendix Section A.1. An ETC applicant must be a “common carrier” as defined by federal law.¹⁶ The Company will provide broadband Internet access service and voice service in the Designated Service Area. The Company will provide voice service as either telecommunications service or VoIP service. As to customers and locations in which the Company is awarded RDOF support or Lifeline-only customers, the Company will provide its voice service on a common carrier basis.

14. FCC Rule 54.201(d)(1); FCC Rule 54.201(i); ETC Order, Appendix Section A.2. An ETC applicant must demonstrate that it is capable of providing and will continuously provide the supported services throughout the service area either by using its own facilities or a combination of its own facilities and the resale of another carrier’s services. The Company certifies it will offer the services that are supported by the federal universal service support mechanisms in the Designated Service Area either using its own facilities or a combination of its own facilities and the resale of another carrier’s services.¹⁷ Under current FCC rules, the two services are supported by the federal universal service support mechanisms: (1) voice telephony services; and (2) broadband Internet access services.¹⁸ Eligible voice telephony services must provide voice grade access to the public switched telephone network (“PSTN”) or its functional equivalent, minutes of use for local service provided at no additional charge, access to

¹⁶ 47 U.S.C. § 153(11).

¹⁷ 47 C.F.R. § 54.101(a); *see also ETC Order, Appendix Section A.2.*

¹⁸ 47 C.F.R. § 54.101(a).

emergency 911 and enhanced 911 service in locations where implemented, and for qualifying low-income consumers, toll limitation service.¹⁹ Eligible broadband Internet access services must 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, but excluding dial-up service.²⁰

15. The Company certifies that it will offer voice and broadband services in the Designated Service Area that comply with the FCC's requirements. The Company's voice offering will provide voice grade access to the PSTN, and will include unlimited local calling. In addition, the Company's voice offering will provide consumers with access to 911 and enhanced 911 to the extent local governments have implemented such services. With respect to toll limitation service, the FCC eliminated the requirement to provide toll limitation services if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.²¹ As explained below, the Company plans to offer unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area, and thus the Company is not required to provide toll limitation service in connection with its Lifeline service offering.

16. Similarly, the Company's broadband Internet access service offering will provide consumers with the capability to transmit data to and receive data from all or substantially all Internet endpoints. The Company's broadband Internet access service offering will meet the minimum service standards required by the FCC's rules,²² as well as the service standards

¹⁹ 47 C.F.R. § 54.101(a)(1).

²⁰ 47 C.F.R. § 54.101(a)(2).

²¹ *Lifeline Reform Order* ¶ 49.

²² 47 C.F.R. § 54.408(b)(1).

applicable for the receipt of RDOF funding.²³

17. The Company will use a combination of its own facilities and the facilities of other providers to offer the supported services in the Designated Service Area. Under FCC rules, facilities are the ETC's "own" if the ETC has exclusive right to use the facilities to provide the supported services or when service is provided by any affiliate within the holding company structure.²⁴ Further, pursuant to FCC requirements, the Company will submit detailed information to the FCC regarding the Company's intended technology and system design for the provision of RDOF-funded services in the Designated Service Area, including network diagrams certified by a professional engineer.²⁵

18. FCC Rule 54.201(d)(2); FCC Rule 54.405(b)-(d); ETC Order, Appendix Section A.3. An ETC applicant must demonstrate that it will advertise the availability of its offering and the charges therefore using media of general distribution. The Company will publicize the availability of its voice and broadband service offerings throughout the Designated Service Area using media of general distribution.²⁶ The Company will use a combination of digital and traditional media, such as the Internet, outbound email, outdoor advertising, radio advertising, newspaper and magazine advertising, and direct marketing materials. The Company also will rely on the marketing practices and advertising expertise of Cable One to advertise the availability of its service offerings in the Designated Service Area.

19. In addition, with respect to Lifeline services, the Company will publicize the availability of its Lifeline service offerings in the Designated Service Area in a manner

²³ RDOF Order ¶¶ 31, 33.

²⁴ See, e.g., *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, nn. 23-24 (2018).

²⁵ Public Notice ¶¶ 16-17.

²⁶ 47 C.F.R. § 54.201(d)(2).

reasonably designed to reach those likely to qualify for the service.²⁷ Using easily understood language, the Company will indicate on all materials describing its Lifeline service that: (1) it is a Lifeline service; Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; and (5) the program is limited to one discount per household.²⁸ The Company also will disclose its name or its DBA name on all materials describing the Lifeline service.²⁹

20. FCC Rule 54.201(h); FCC Rule 54.202(a)(4). An ETC applicant seeking to provide Lifeline services must demonstrate it is financially and technically capable of providing Lifeline service in compliance with the FCC's rules. The FCC has stated that the "relevant considerations" for satisfying this requirement would be whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.³⁰

21. The Company is financially and technically capable of offering Lifeline services in the Designated Service Area. As discussed above, the Company's parent and affiliates have been offering services in Idaho and several other states for many years. Cable One also can provide the Company with additional financial and technical support as needed, and the

²⁷ 47 C.F.R. § 54.405(b).

²⁸ 47 C.F.R. § 54.405(c). For these purposes, the term "materials describing the service" includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms. *See id.*

²⁹ 47 C.F.R. § 54.405(d).

³⁰ *Lifeline Reform Order* ¶ 388.

Company will utilize the same management and day-to-day operational personnel.³¹ The Company currently provides voice services in Arizona, and thus will not rely exclusively on universal service fund disbursements to operate. Finally, the Company has not been subject to enforcement action or ETC revocation proceedings in any state.

22. ETC Order, Appendix Section A.5. The Commission's *ETC Order* requires an ETC applicant seeking designation for "any part of tribal lands" to provide a copy of its application to the affected tribal government or tribal regulatory authority, as applicable. A portion of one Census Block Group in the RDOF portion of the Designated Service Area (Census Block Group 160059400001 in Bannock County) overlaps with the Fort Hall Reservation on which the Shoshone-Bannock Tribes are located. Thus, some of the locations within that Census Block Group may be located on tribal land. Further, some of the Lifeline-only service areas overlap with the Fort Hall Reservation. Accordingly, the Company certifies that it will provide a copy of this Application to the Shoshone-Bannock Tribal Attorney's Office via certified U.S. Mail and electronic mail within one (1) business day of the Application being filed with the Commission.

23. FCC Rule 54.202(a)(1); ETC Order, Appendix Section B.1. An ETC applicant must demonstrate its commitment and ability to provide the supported services. The Company certifies that it will comply with the service requirements applicable to RDOF support and Lifeline support in the Designated Service Area. The Company also certifies that it will: (a) provide service on a timely basis to requesting customers within the Designated Service Area; and (b) provide service within a reasonable period of time if the potential customer is within the Designated Service Area, but outside the Company's existing network coverage if service can be

³¹ The Company's financial reporting is consolidated with its parent Cable One. Financial information concerning Cable One can be found at: <https://ir.cableone.net/corporate-profile/default.aspx>.

provided at a reasonable cost. The Company notes it must meet certain service milestones and buildout requirements in the Designated Service Area as a condition of receiving RDOF support.³²

24. An ETC applicant also must submit network improvement plans at designated intervals. A five-year network improvement plan is no longer necessary for entities seeking Lifeline-only designation.³³ Further, the FCC has waived the requirement for a winning bidder in Auction 904 to file a five-year network improvement plan as part of the ETC designation process.³⁴ The Commission's *ETC Order* chose to require ETCs to submit a two-year network improvement plan.³⁵ The Company respectfully requests the Commission waive its two-year network improvement plan requirement as it has done for other ETC applicants based on similar facts addressing such plan requirements.³⁶

25. FCC Rule 54.202(a)(2); ETC Order, Appendix Section B.2. An ETC applicant must demonstrate that it can remain functional in emergency situations. The Company certifies it will have the ability to remain functional in emergency situations in the Designated Service Area. The Company has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Separate FCC rules also require the

³² *RDOF Order* ¶ 45. For purposes of meeting the FCC's service milestones, a RDOF recipient will be deemed to be commercially offering voice and/or broadband service to a location if it provides service to the location or could provide service to the location within 10 business days upon request. *See id.* ¶ 54.

³³ *Lifeline Reform Order* ¶ 386.

³⁴ *Public Notice* at n.71 (applying the same waivers previously applied to ETC designations for the CAF-II auction to ETC designations for Auction 904).

³⁵ *ETC Order* at 8.

³⁶ *See, e.g., Order No. 34254* ("Staff determined that . . . a two-year network improvement and progress report is not required due to the FCC's waiver of the five-year plan as part of its ETC designation process. . . . We agree with Staff. Because the FCC waived the requirement for a winning bidder to file a five-year plan as part of the ETC designation process, a network improvement plan is not required under Intermax's Application."); *Order No. 34253* (same); *Order No. 32723* (waiving two-year network improvement plan requirement for Lifeline-only applicant).

Company to implement certain back-up power requirements.³⁷ In addition, as a subsidiary of Cable One, the Company will be able to rely on Cable One's disaster recovery contingency plans such as the use of diverse/alternate routing, electronics redundancy, redundant data centers, geographically separated operations, and environmental controls for data and switching centers to remain functional in an emergency situation.

26. FCC Rule 54.202(a)(3); ETC Order, Appendix Section B.3. An ETC applicant must certify that it will comply with all applicable service quality standards and consumer protection rules.³⁸ The Company certifies that it will comply with service quality standards and consumer protection rules applicable to its provision of service in the Designated Service Area.

27. FCC Rule 54.202(a)(5); FCC Rule 54.202(a)(6); ETC Order, Appendix Section B.4. The *ETC Order* requires an ETC applicant to provide a description of its local usage plans and a description of the local usage plans of the incumbent local exchange carrier ("ILEC"). FCC rules also require Lifeline-only ETC applicants to provide information describing the terms and conditions of voice telephony service and broadband Internet access service plans to be offered to Lifeline subscribers. For Lifeline services, the FCC has determined that providers may satisfy the obligation to provide local usage via service offerings that bundle local and long distance minutes.³⁹

28. At this time, the Company plans to offer service plans that include high-speed Internet access service and unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area. The Company also will offer standalone voice services as

³⁷ 47 C.F.R. § 9.20.

³⁸ The FCC has waived the requirement for a winning bidder in Auction 904 to demonstrate that it will satisfy consumer protection and service quality standards as part of the ETC designation process. *See Public Notice* at n.71 (applying the same waivers previously applied to ETC designations for the CAF-II auction to ETC designations for Auction 904).

³⁹ *Lifeline Reform Order* ¶ 49.

required by the FCC.⁴⁰ The Company is conducting market research in the Designated Service Area to determine what mix of services potential customers prefer. The Company has not yet determined the specific details of its service offerings and associated rates to be offered in the Designated Service Area. The Company will make services available based on customer demand in each market. Further, the Company's pricing will be reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements.⁴¹ By way of example, the FCC's 2021 urban average monthly rate is \$33.73, and the reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.75.⁴² Accordingly, each ETC providing fixed voice service must certify to the FCC in July 2021 that the pricing of its basic residential voice services is no more than \$54.75. The Company will offer calling plans comparable to those offered by ILECs in the Designated Service Area.

29. ETC Order, Appendix Section C. All ETCs requesting high-cost support must provide certain information to the Commission on an annual basis. The Company certifies that it will comply with all applicable annual reporting requirements of the Commission, including the requirement to report information concerning: (1) outages; (2) unfulfilled service requests; (3) complaints; (4) consumer protection and service quality standards; and (4) the Company's local usage plans and ILEC local usage plans. As set forth above, the Company seeks waiver of the two-year network improvement plan and progress report consistent with the Commission's rulings for similarly situated applicants.

30. ETC Order, Appendix Section D. All ETCs must certify on an annual basis that

⁴⁰ RDOF Order ¶ 42.

⁴¹ RDOF Order ¶ 42.

⁴² WC Docket No. 10-90, *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*, Public Notice, DA 20-1049 (rel. Nov. 30, 2020).

all federal high-cost support provided to the ETC will be used only for the provision, maintenance, and upgrading of facilities and services for which the support was intended. The Company certifies that, in accordance with 47 U.S.C. § 254(e), it will use the RDOF support it receives for the Designated Service Area only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

31. FCC Rule 54.405(a). An ETC providing Lifeline services must make Lifeline service available to qualifying low-income consumers. The Company certifies that its Lifeline service offering will conform to the definition of “Lifeline” in the FCC’s rules.⁴³

32. FCC Rule 54.405(e). An ETC providing Lifeline services must implement certain de-enrollment procedures for Lifeline customers. The Company certifies it will comply with the FCC’s de-enrollment procedures and will have general de-enrollment procedures in place for Lifeline services. In accordance with FCC requirements, the Company will de-enroll Lifeline customers for no longer qualifying for Lifeline service, for duplicative support, for non-usage, for failure to re-certify, and when requested by the Lifeline customer.

33. FCC Rule 54.409; FCC Rule 54.410. The Company certifies that it will verify the eligibility of its Lifeline subscriber base in accordance with FCC rules. The Company also will establish processes for ensuring Lifeline services are provided only to eligible customers, including procedures for confirming consumer eligibility, enrolling eligible customers, re-certifying eligibility at regular intervals, and recordkeeping.

⁴³ 47 C.F.R. § 54.401(a).

CONCLUSION

WHEREFORE, for the forgoing reasons, the Company respectfully requests that the Commission expeditiously designate it as an ETC for the provision of voice and broadband services in the Designated Service Area.

Dated: January 8, 2021

Respectfully submitted,

CABLE ONE VOIP LLC

/s/ Ronald L. Williams

Ronald L. Williams, ISB #3034
Williams Bradbury, P.C.
802 W. Bannock Street
Suite LP 100
Boise, ID 83702
(208) 344-6633
ron@williamsbradbury.com

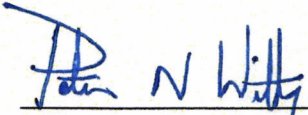
Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202-862-8900 (telephone)
212-2695420 (facsimile)
ckiser@cahill.com
acollins@cahill.com

Its Attorneys

VERIFICATION

I, Peter N. Witty, hereby state that I am the Vice President & Secretary of Cable One VoIP LLC (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing Application was prepared under my direction and supervision; and that the contents of the foregoing Application are true and correct to the best of my knowledge, information, and belief.

Executed this 7th day of January 2021.

A handwritten signature in blue ink, appearing to read "Peter N. Witty", is written over a horizontal line.

Peter N. Witty
Vice President & Secretary
Cable One VoIP LLC

EXHIBITS

Exhibit 1 Designated Service Area

Exhibit 2 Authorization to Conduct Business in Idaho and Evidence of DBA Name

Exhibit 3 Officers

EXHIBIT 1
Designated Service Area

RDOF Service Areas

<u>County</u>	<u>Census Block Group</u>
Ada	160010001002
Ada	160010001003
Ada	160010002023
Ada	160010008051
Ada	160010009001
Ada	160010009004
Ada	160010010002
Ada	160010021001
Ada	160010023103
Ada	160010102011
Ada	160010102012
Ada	160010102251
Ada	160010103211
Ada	160010103311
Ada	160010103321
Ada	160010103351
Ada	160010105011
Ada	160010105031
Bannock	160050002001
Bannock	160050002003
Bannock	160050003001
Bannock	160050003003
Bannock	160050004001
Bannock	160050005001
Bannock	160050006002
Bannock	160050007001
Bannock	160050007002
Bannock	160050008001
Bannock	160050010003
Bannock	160050011021
Bannock	160050011022
Bannock	160050014001
Bannock	160050015001
Bannock	160050015002
Bannock	160050015005

<u>County</u>	<u>Census Block Group</u>
Bannock	160050016011
Bannock	160050016012
Bannock	160050016032
Bannock	160059400001
Bonneville	160199701002
Bonneville	160199715001
Bonneville	160199715002
Canyon	160270219032
Canyon	160270223002
Jefferson	160519604001
Nez Perce	160699603002
Nez Perce	160699604004
Nez Perce	160699608002
Nez Perce	160699608003
Nez Perce	160699610001
Payette	160759601003
Payette	160759602003
Payette	160759604001
Payette	160759604003
Twin Falls	160830006001
Valley	160859702002
Valley	160859703001

Additional Lifeline-Only Service Areas

(the following franchise areas may include the census block groups covered by the RDOF service area listed above, but Lifeline-only service will be offered only in those areas not covered by the RDOF service area)

<u>Franchise Area</u>	<u>County</u>
Garden	Ada
Boise	Ada
Ada	Ada
Shelley	Bingham
Firth	Bingham
Bingham	Bingham
Bingham	Bingham
Iona	Bonneville
Basalt	Bingham
Blackfoot	Bingham
Bonneville	Bonneville
Idaho Falls	Bonneville
Ririe	Bonneville
Ucon	Bonneville
Ammon	Bonneville
St. Anthony	Fremont
Fremont	Fremont
Teton	Fremont
Rigby	Jefferson
Ririe	Jefferson
Sugar City	Madison
Rexburg	Madison
Madison	Madison
Rockford	Bingham
Lewiston	Nez Perce
Nez Perce	Nez Perce
Chubbuck	Bannock
Pocatello	Bannock
Inkom	Bannock
Bannock	Bannock
American Falls	Power
Salmon	Lemhi
Salmon	Salmon
Burley	Cassia
Burley	Minidoka
Burley	Cassia

<u>Franchise Area</u>	<u>County</u>
Hagerman	Gooding
Wendell	Gooding
Wendell	Gooding
Gooding	Gooding
Gooding	Gooding
Jerome	Jerome
Shoshone	Lincoln
Jerome	Jerome
Heyburn	Minidoka
Minidoka	Minidoka
Rupert	Minidoka
Paul	Minidoka
Kimberly	Twin Falls
Filer	Twin Falls
Hansen	Twin Falls
Twin Falls	Twin Falls
Buhl	Twin Falls
Twin Falls	Twin Falls
Meridian	Ada
Boise	Ada
Star	Ada
Star	Ada
Kuna	Ada
Horseshoe Bend	Boise
Canyon	Canyon
Greenleaf	Canyon
Greenleaf	Canyon
Nampa	Canyon
Notus	Canyon
Notus	Canyon
Parma	Canyon
Canyon	Canyon
Middleton	Canyon
Canyon	Canyon
Purple Sage	Canyon
Wilder	Canyon
Caldwell	Canyon
Cassia	Cassia
Emmett	Gem
Owyhee	Owyhee

<u>Franchise Area</u>	<u>County</u>
Fruitland	Payette
Payette	Payette
Homedale	Owyhee
Payette	Payette
Payette	Payette
New Plymouth	Payette
Ada	Ada
Marsing	Owyhee
Eagle	Ada
New Meadows	Adams
Gem	Gem
Cascade	Valley
Donnelly	Valley
McCall	Valley

Map of Designated Service Area

(includes both RDOF census block groups and Lifeline-only areas)

Purple shows the current franchise areas served by Cable One, Inc. in Idaho, which will be the geographic areas in which the Company will offer Lifeline-only service.

Green shows the boundaries of the census block groups awarded in the RDOF auction (Auction 904).



EXHIBIT 2
Idaho Secretary of State Documentation

State of Idaho

Office of the Secretary of State

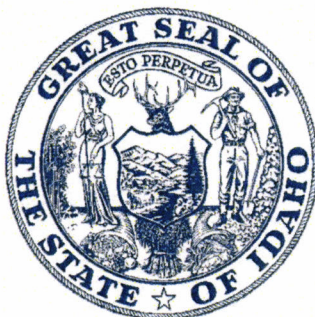
CERTIFICATE OF REGISTRATION OF CABLE ONE VOIP LLC

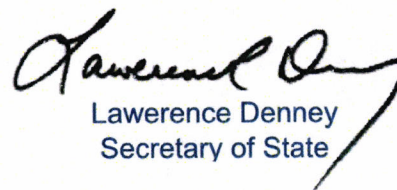
Filing Number: 4121333

I, LAWERENCE DENNEY, Secretary of State of the State of Idaho, hereby certify that an application for Foreign Registration Statement, duly executed pursuant to the provisions of the Idaho Uniform Business Organization Code, has been received in this office and is found to conform to law.

ACCORDINGLY, by virtue of the authority vested in me by law, I issue this Certificate of Registration to transact business in this State and attach hereto a duplicate of the application for such certificate.

Dated: 7 January 2021




Lawrence Denney
Secretary of State

Processed by: Business Division



STATE OF IDAHO

Lawerence Denney | Secretary of State
Business Office
450 North 4th Street
PO Box 83720
Boise, ID 83720

Sparklight
210 E EARLL DR
PHOENIX, AZ 85012-2626

January 7, 2021

Filing Acknowledgment

Please review the filing information below and notify our office immediately of any discrepancies.

File #:	4121725		
Filing Type:	Assumed Business Name	Expiration Date:	
Filing Date:	01/07/2021 2:57 PM	Image # :	B0566-3828
Status:	Active-Current	Receipt #:	000428900

Congratulations on the successful filing of your **Certificate of Assumed Business Name** for **Sparklight** in the State of Idaho on the date shown above.

Mailing Address

210 E EARLL DR
PHOENIX, AZ 85012-2626

When corresponding with this office or submitting documents for filing, please refer to the file number given above.

A handwritten signature in black ink, appearing to read "Lawrence Denney".

Lawerence Denney

Idaho Secretary of State

Processed By: Business Division

EXHIBIT 3
Officers of Cable One VoIP LLC

As of January 1, 2021, the following are the officers of Cable One VoIP LLC:

Julia M. Laulis, President & Chief Executive Officer

Laulis joined Cable One in 1999 as Director of Marketing-NW Division. In 2001, she was named Vice President of Operations for the SW Division. In 2004, she became responsible for starting Cable One's Phoenix Customer Care Center. Laulis was named Chief Operations Officer in 2008, responsible for the company's three operation divisions and two call centers. In 2012, Laulis was named Chief Operating Officer, adding sales, marketing, and technology to her responsibilities. In 2015, Laulis was promoted to President and Chief Operating Officer of Cable One. In 2017, she was named President and Chief Executive Officer and in 2018 she was named Chair of the Board. Prior to joining Cable One, Laulis was with Jones Communications in the Washington, DC area and Denver, where she served in various marketing management positions. Laulis began her 35-year career in the cable industry with Hauser Communications. Laulis graduated from Indiana University in Bloomington with a bachelor's degree in Telecommunications. She attended the Woman in Cable Television Betsy Magness Leadership Institute in 1998/1999 and graduated from the Program for Management Development at the Harvard Business School in 2002. Cable FAX Magazine has named Laulis one of the Most Powerful Women in Cable for the past 10 years running. Laulis currently serves on the boards of The AES Corporation, CableLabs, The Cable Center, and C-SPAN and is a trustee of the C-SPAN Education Foundation.

Michael E. Bowker, Vice President

Mike Bowker is Chief Operating Officer for Cable One. He is responsible for overseeing Cable One's daily operations, technology, and residential and business channels. Bowker joined Cable One in 1999 as Advertising Regional Sales Manager. He is a member of the team that successfully launched the commercial sales division and the residential inbound sales call center. Bowker has been a Vice President of Cable One since 2005. He was named Vice President of Sales in 2012 and was promoted to Senior Vice President, Chief Sales and Marketing Officer in 2014. Prior to joining Cable One, Bowker was with AT&T Media Services and TCI Cable, where he served in various sales management positions. A native of Boise, Idaho, Bowker holds a bachelor's degree in Communication from Boise State University and is a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Bowker currently serves as Vice Chairman of ACA — America's Communications Association.

Steven S. Cochran, Vice President

Steven Cochran is Senior Vice President and Chief Financial Officer at Cable One. He is responsible for the areas of accounting, reporting, finance, and investor relations. A veteran of the cable industry, Cochran spent 15 years at Wide Open West (WOW), a Denver-based cable operator. During his tenure at WOW, Cochran held positions of increasing responsibility, including Chief Financial Officer, Chief Operating Officer, and President and Chief Executive Officer. Prior to WOW, Cochran was Senior Vice President and Chief Financial Officer at Millennium Digital Media. Cochran holds a master's degree in accounting science and a bachelor's degree in economics from the University of Illinois—Urbana Champaign

Jarrold L. Head, Vice President

Jarrold Head is Vice President of Engineering and Construction for Cable One. He is responsible for outside plant engineering, design and construction. Before joining Cable One, Head served as Vice President of Engineering & Technical Operations for Fidelity Communications and its subsidiaries. Prior to that position, he served as Engineering Director for Fidelity, overseeing Engineering and Network Operation teams to design, implement and support Fidelity's advanced technology services. Head holds a bachelor's degree in Electrical Engineering from Missouri University of Science and Technology.

Kenneth E. Johnson, Vice President

Ken Johnson is Senior Vice President of Technology Services at Cable One. He is responsible for the strategic evolution of technology roadmaps related to products, as well as Information Technology, and Network & Engineering. Before joining Cable One, Johnson served as Chief Operating Officer and Chief Technology Officer for NewWave Communications. Prior to NewWave, Johnson was Chief Technology Officer for SureWest Communications and Everest Connections. Originally from Lenexa, Kansas, Johnson holds a bachelor's degree in Computer and Information Sciences from Friends University. Johnson currently serves on the board of the National Cable Television Cooperative.

Eric M. Lardy, Vice President & Assistant Secretary

Eric Lardy is Senior Vice President of Operations and Integration for Cable One. He is responsible for overseeing the company's day-to-day operations, acquisition integration and long-term strategic operating plans. A more than 20-year veteran in the cable industry, Lardy joined Cable One as a Pay-Per-View Manager in the Fargo, North Dakota cable system. He was later promoted to Internet Business Manager, launching dial-up and high-speed broadband services. Lardy relocated several times and held a variety of positions in Marketing, Operations, and system General Management before being promoted to Director of New Products and Service Projects in 2012. In 2014, he was named Vice President of Strategy and Finance. In 2017, he was promoted to Senior Vice President, adding oversight of human resources and business intelligence to his responsibilities. Lardy holds bachelor's degrees in Marketing and International Business from Minnesota State University and an MBA from Arizona State University.

Raymond L. Storck, Jr., Vice President & Treasurer

Ray Storck is Vice President of Finance and Treasurer for Cable One. He is responsible for all of the company's accounting functions. Before joining Cable One, Storck served as Controller at Kona Grill. Prior to that, Storck was Vice President/Controller and then Chief Financial Officer for MicroAge. Following MicroAge, Storck spent 4 years at PetSmart where he served as Vice President/Controller and then Vice President of Finance and Chief Accounting Officer. A native of Iowa, Storck holds a bachelor's degree in Accounting from the University of Northern Iowa.

Peter N. Witty, Vice President & Secretary

Peter N. Witty is Senior Vice President, General Counsel and Secretary for Cable One. He is responsible for overseeing the company's legal, regulatory and compliance functions. Witty has more than 20 years of legal experience. Before joining Cable One, he served as General Counsel and Secretary for Gas Technology Institute (GTI), a leading energy research, development and training organization. Prior to GTI, Witty spent 10 years with Abbott Laboratories, serving in various positions, including as Senior Counsel and Division Counsel. Witty also previously practiced law as an associate at Latham & Watkins LLP and Ross & Hardies (now McGuireWoods LLP). Witty holds a Juris Doctor from Notre Dame Law School and a bachelor's degree in aerospace engineering from the University of Notre Dame. He is also a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Prior to attending law school, Witty was an officer and helicopter pilot in the 101st Airborne Division (Air Assault), where he served during Operations Desert Shield/Desert Storm.

Additional information on the officers and directors of the Company's parent, Cable One, Inc., can be found at: <https://ir.cableone.net/corporate-information/officers-directors/default.aspx>.