

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF CONEXON)
CONNECT, LLC FOR DESIGNATION AS AN) CASE NO. 2020-00420
ELIGIBLE TELECOMMUNICATIONS)
CARRIER)**

APPLICATION FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Pursuant to § 214(e)(2) of the Communications Act of 1934 (“Act”), as amended, Conexon Connect, LLC (“Conexon Connect” or “Applicant”) respectfully requests designation as a High-Cost and Low-Income Eligible Telecommunications Carrier (“ETC”) in the Commonwealth of Kentucky in all areas in which Conexon Connect, through its participation in the Rural Electric Cooperative Consortium, has been allocated Rural Digital Opportunity Fund (“RDOF”) Phase I support as a winner in the Federal Communications Commission’s (“FCC”) RDOF Phase I auction (“Auction 904”). Applicant is obligated to obtain ETC designation status within 180 days of the FCC’s announcement of its winning bids for the locations it will serve¹ and, therefore, requests the Commission expeditiously review this application.

I. INTRODUCTION AND SUMMARY

Applicant’s full name and post office address is: Conexon Connect, LLC, 2001 Grand Boulevard, Suite 700, Kansas City, MO 64108. Applicant is a limited liability company organized under the laws and Missouri and is authorized to transact business in Kentucky.

¹ 47 C.F.R. § 54.804(b)(5).

Applicant was recently formed to assist with the deployment and operation of a new state-of-the-art, low-latency, fiber-to-the-home (“FTTH”) network and to provide high-speed broadband Internet access and Voice over Internet Protocol (“VoIP”) services to areas across the country which largely lack access to such services and where Applicant, through its participation in the Rural Electric Cooperative Consortium, was recently awarded federal subsidies in the FCC’s RDOF Phase I auction. Applicant will offer low-latency broadband service at actual speeds of at least 1 Gigabit per second downstream and 500 Mbps upstream and offer at least 2 terabytes of monthly usage. Applicant will also provide its customers with voice grade access to the Public Switched Telephone Network (“PSTN”) through its provision of interconnected VoIP service.

Applicant is a wholly-owned subsidiary of Conexon, LLC (“Conexon”). Conexon, which manages more rural fiber construction in the United States than any other company, works with rural electric cooperatives to bring FTTH to rural communities across the country. Conexon’s goal is to ensure that rural homes and businesses have access to the life- and community-changing benefits fiber-optic networks deliver. Conexon has assisted nearly 200 rural electric cooperatives – 50 of which are deploying fiber networks – and helped connect more than 150,000 FTTH subscribers across the country. Conexon debuted on the Inc. 500 listing of America’s fastest-growing private companies in 2020, with three-year revenue growth of over 1,400 percent.² It ranked No. 9 within the telecommunications industry and No. 325 overall.

Applicant will deploy broadband and interconnected VoIP services throughout the census blocks identified in **Exhibit A** hereto, in which it was awarded RDOF Phase I subsidies and seeks ETC designation from the Commission to serve these census blocks. Applicant meets all requirements for ETC designation.

² See <https://www.inc.com/inc5000/2020> (“Inc. 5000 2020: Introducing the 5,000 Fastest-Growing Private Companies in America”) (last visited Jan. 5, 2021).

As discussed in more detail below, the Commission has the authority to grant ETC designation status to Conexon Connect pursuant to § 214(e)(2) of the Act and Conexon Connect meets all statutory and regulatory requirements for ETC designation. Designating Conexon Connect as a High-Cost and Low-Income ETC in its winning Auction 904 census blocks will serve the public interest by enabling it to provide voice and gigabit tier broadband services throughout its proposed ETC designation area. Applicant acknowledges its obligation to collect the Kentucky Universal Service Fund (“USF”) surcharge prescribed by the Commission.

II. THE COMMISSION HAS AUTHORITY TO GRANT THE ETC DESIGNATION REQUESTED BY APPLICANT

The Commission has the requisite authority to perform the ETC designation requested herein. Section 214(e)(2) of the Communications Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.³ Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier.⁴ Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1). By proposing to offer all services supported by the federal USF and advertising the availability of such services, Conexon Connect will meet all requirements of Section 214 of the Communications Act, warranting its designation as an ETC by the Commission.

³ 47 U.S.C. § 214(e)(2).

⁴ See, e.g., *Petition of T-Mobile Central LLC and Powered/Memphis for Designation as Eligible Telecommunications Carriers*, Case No. 2010-00050 (Ky. PSC July 14, 2010) (“*T-Mobile Designation Order*”).

III. APPLICANT MEETS THE STATUTORY AND REGULATORY PREREQUISITES TO BE DESIGNATED AS AN ETC

As demonstrated herein, Applicant satisfies each of the statutory and regulatory requirements set forth in the Act and the FCC's Rules to be a High-Cost and Low-Income ETC.

A. Applicant Will Provide Service as a Common Carrier

Applicant will provide service on a common carrier basis. As such, Applicant certifies that it is a common carrier under §§ 214(e)(1) and 214(e)(2) of the Act.⁵

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

As described below, Applicant certifies that it will provide the following services that are supported by federal universal service support mechanisms:⁶

1. Voice Grade Access to the PSTN – Applicant will meet this requirement through the provision of IP-based voice communications service that is interconnected to the PSTN. Applicant will be legally responsible for dealing with customer problems, providing quality of service guarantees, and meeting universal service-related requirements. Applicant will offer stand-alone voice telephony service throughout its proposed ETC designation area and will offer such service at rates that are reasonably comparable to urban rates. This service will include minutes of use for local service provided at no charge to end users and access to emergency services via 911 or E-911, wherever available from local government or public safety organizations.⁷ Applicant also commits to provide toll limitation services to qualifying low-income consumers as provided in §§ 54.400 - 54.423 of the FCC's Rules.⁸
2. Broadband Internet Access Services – Applicant's broadband Internet offering will provide the capability to transmit data to and receive data by wire from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service. Applicant will offer low-latency broadband Internet service at speeds of 1 Gbps or higher throughout its proposed ETC

⁵ See Exhibit B (Affidavit of Teresa Hannay).

⁶ See *id.*

⁷ 47 C.F.R. § 54.101(a)(1) and (b).

⁸ 47 C.F.R. § 54.101(a)(1).

designation area and will offer such service at rates that are reasonably comparable to urban rates.⁹

3. Lifeline Service – Applicant will offer Lifeline voice and broadband services to qualifying low-income consumers in accordance with the FCC’s Rules throughout its proposed ETC designation area.¹⁰

Applicant further commits to provide these services consistent with the FCC’s High-Cost and Low-Income universal service support rules applicable to it.¹¹

C. Applicant Will Provide Service Using Its Own Facilities

Applicant will deploy and operate a new state-of-the-art, low latency, FTTH facilities-based network to provide high-speed broadband Internet access and interconnected VoIP-based voice services to those residences and businesses located within its proposed ETC designation area who lack access to such services.¹²

D. Applicant Will Provide the Requisite RDOF Phase I Supported Services Throughout the Proposed ETC Designation Area

Applicant commits to providing the supported services throughout its proposed ETC designation area, consistent with all applicable requirements.¹³

E. Applicant Will Advertise the Availability of Its Services and Charges Using Media of General Distribution

Applicant will advertise the availability of and charges for its supported service offerings using media of general distribution, and will undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements.¹⁴ Applicant will offer and advertise its broadband and interconnected VoIP services, including those offerings that

⁹ 47 C.F.R. § 54.101(a)(2).

¹⁰ 47 C.F.R. § 54.405(a), 54.400 *et seq.*

¹¹ *See* 47 C.F.R. §§ 54.101 and 54.201.

¹² 47 C.F.R. § 54.201(d)(1).

¹³ *See* 47 C.F.R. §§ 54.101 and 54.201.

¹⁴ 47 C.F.R. § 54.201(d)(2).

include all of the supported services, through a combination of media channels, such as television and radio, newspaper, magazines, and other print advertisements, outdoor advertising, direct marketing, and/or the Internet. Applicant will use the appropriate media outlets to advertise its universal service offerings in a manner consistent with applicable requirements.

F. Applicant Possesses the Financial and Technical Capability to Provide the Supported Services

With the financial backing of its parent, Conexon, Applicant possesses the financial and technical capabilities to pay for all start-up expenses (e.g., construction, hardware, operations) to build its fiber optic network and to begin the provision of voice and broadband services throughout its proposed ETC designation area. Applicant will be able to obtain the requisite amount of lending under its existing lines of credit and Applicant will be able to obtain additional financing, if necessary, in addition to the RDOF Phase I support being made available to Applicant. Additional construction funding and other financial information will be provided to the FCC by Applicant as part of its FCC Form 683 application.

G. Applicant Will Meet the Additional Requirements for Designation as an ETC

Applicant further certifies that it will meet all FCC requirements for designation as an ETC under § 214(e)(2) of the Act.¹⁵

1. **Compliance with Applicable Service and Performance Quality Requirements.** Applicant certifies that it will comply with the service requirements applicable to the support that it receives, including the requirements for RDOF Phase I support, and will provide additional information in this regard as part of its FCC Form 683 application, including a certification from a professional engineer that the fiber optic network is capable of delivering voice and broadband service that meets the requisite performance requirements and sufficient capacity to meet customer demand at or above the prescribed levels during peak usage periods.¹⁶

¹⁵ See Exhibit B.

¹⁶ See 47 C.F.R. § 54.309.

2. **Ability to Remain Functional in Emergency Situations.** Applicant certifies that its fiber optic network will have the ability to remain functional in emergency situations, will have a reasonable amount of back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities and will be capable of managing traffic spikes resulting from emergency situations.¹⁷ Applicant’s fiber optic network will support telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including 911 services.

IV. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST

Granting this application will clearly serve the public interest by permitting Applicant to provide low latency, gigabit-speed broadband and interconnected VoIP-based voice services to residents and businesses located within its proposed ETC designation area, as well as subsidized voice and broadband services to those households that qualify for federal Lifeline benefits. Applicant’s participation will “encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans . . . ,”¹⁸ and will promote the efficient and effective use of federal universal service support, including RDOF Phase I support.

V. CONCLUSION

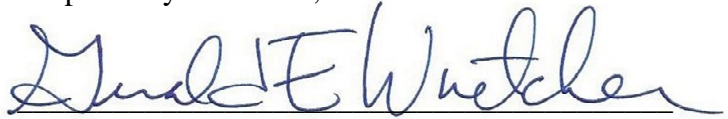
For the foregoing reasons, Conexon Connect respectfully requests that the Commission place this application at the head of the Commission’s docket and enter an Order no later than **May 1, 2021** designating Conexon Connect as a High-Cost and Low-Income ETC to ensure Conexon Connect’s eligibility to receive the RDOF Phase I support awarded in Auction 904.

¹⁷ See 47 C.F.R. § 54.202(a)(2).

¹⁸ 47 U.S.C. § 1302(a).

Dated: January 5, 2021

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Conexon Connect, LLC's electronic filing of this document is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on January 5, 2021; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that within 30 days following the end of the state of emergency announced in Executive Order 2020-215 this Notice in paper medium will be delivered to the Public Service Commission.



Gerald E. Wuetcher

EXHIBIT A

**LIST OF CENSUS BLOCKS IN WHICH APPLICANT SEEKS
DESIGNATION AS A HIGH COST AND LOW INCOME
ELIGIBLE TELECOMMUNICATIONS CARRIER**

210279603003013	210279603003115	210339201002016	210339201002101
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210279603003019	210279603003125	210339201002024	210339201002104
210279603003020	210279603003127	210339201002034	210339201002109
210279603003022	210279603003130	210339201002037	210339201002110
210279603003025	210319305001015	210339201002039	210339201002111
210279603003026	210319305001079	210339201002040	210339201002112
210279603003027	210319305001082	210339201002043	210339201002113
210279603003037	210319305001087	210339201002044	210339201002117
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212339604005045
212339604005048


EXHIBIT B

AFFIDAVIT OF TERESA HANNAY

STATE OF FLORIDA)
) SS.
COUNTY OF VOLUSIA)

Teresa Hannay, after being duly sworn, states the following:

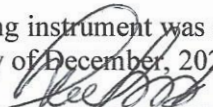
1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.
2. I am the Vice President, Telecommunication Services at Conexon Connect, LLC. I have knowledge of the facts stated in the Petition and those facts are true to the best of my knowledge and my belief.
3. Petitioner certifies that it is a common carrier under §§ 214(e)(1) and 214(e)(2) of the Communications Act of 1934, as amended (“Act”).
4. Petitioner commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier (“ETC”) in the census blocks in which Petitioner was awarded RDOF Phase I subsidies.
5. Petitioner certifies that it will meet all of the Commission’s requirements for designation as an ETC under § 214(e)(1) of the Act.
6. Petitioner is eligible to be designated as an ETC within the meaning of Section 214(e) of the Act and is eligible to receive universal service support pursuant to Section 254(e) of the Act.
7. Petitioner will use the federal high-cost support funds that it receives only to provide, deploy, upgrade and/or maintain facilities and services for which the support is intended.



Teresa Hannay
Vice, President, Telecommunication Services
Conexon Connect, LLC

County of Volusia
State of Florida

The foregoing instrument was acknowledged before me
this 30th day of December, 2020, by



Notary Registration Number: GG 189839

My commission expires: FEB 26, 2022

