

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF GIBSON)
CONNECT, LLC FOR DESIGNATION AS AN) CASE NO. 2021-00006
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, Gibson Connect, LLC (“Gibson 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 Gibson Connect, through its participation in the Co-op Connections 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”), as well as Lifeline-only ETC designation in certain additional areas. Gibson Connect was previously designated as an ETC by the Commission following the FCC’s Connect America Fund Phase II auction.¹ Applicant is obligated by the FCC to obtain ETC designation status by June 7, 2021 throughout all of its RDOF Phase I auction winning census blocks and, therefore, requests the Commission expeditiously review this application.²

¹ See *Petition of Gibson Connect, LLC for Designation as an Eligible Telecommunications Carrier*, Order, Case No. 2018-00333 (Ky. PSC Feb. 25, 2019) (“*Gibson Designation Order*”); see also *Application of Gibson Connect, LLC for Designation as an Eligible Telecommunications Carrier*, Petition, Case No. 2018-00333 (filed Sept. 27, 2018) (“*Gibson Connect ETC Petition*”).

² 47 C.F.R. § 54.804(b)(5).

I. INTRODUCTION AND SUMMARY

Applicant's full name and post office address is: Gibson Connect, LLC, P.O. Box 47, Trenton, TN 38382. Applicant is a limited liability company organized under the laws of Tennessee and is authorized to transact business in Kentucky.

Applicant was 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 in Kentucky that lack access to such services. Applicant, through its participation in the Co-op Connections 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 Gibson Electric Membership Corporation ("Gibson EMC"), a non-profit electric cooperative,³ that serves the following four Kentucky counties: Carlisle, Fulton, Graves, and Hickman. Applicant will deploy broadband and interconnected VoIP services throughout the census blocks identified in **Exhibit A1** in which it was awarded RDOF Phase I subsidies. It seeks ETC designation from the Commission to serve these census blocks. In addition, Applicant seeks Lifeline-only ETC designation status in the additional service areas identified in **Exhibit A2**. Applicant meets all requirements for ETC designation.

³ Gibson EMC purchases electricity from the Tennessee Valley Authority ("TVA"). TVA delivers the electricity through its generation and transmission system to Gibson EMC's 16 substations. The voltage is lowered at Gibson EMC's substations and delivered to Gibson EMC's almost 39,000 meters over 3,500 miles of distribution lines in the Kentucky counties of Carlisle, Fulton, Graves, and Hickman.

As discussed in greater detail below, the Commission has the authority to grant ETC designation status to Gibson Connect pursuant to § 214(e)(2) of the Act. Gibson Connect meets all statutory and regulatory requirements for ETC designation. Designating Gibson Connect as a High-Cost and Low-Income ETC in its winning Auction 904 census blocks, as well as a low income-only ETC designation in certain additional areas, will allow Gibson Connect to receive RDOF Phase I support, as well as well as federal and Kentucky Lifeline support for income-eligible voice customers, and 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 Act provides state public utility commissions with the “primary responsibility” for the designation of ETCs.⁴ Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier.⁵ 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, Gibson Connect will meet all requirements of Section 214 of the Act, warranting its designation as an ETC by the Commission.

⁴ 47 U.S.C. § 214(e)(2).

⁵ See, e.g., *Petition of T-Mobile Central LLC and Powertel/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.⁶

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:⁷

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.⁸ 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.⁹
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

⁶ See Exhibit B (Affidavit of Charles L. Phillips, P.E.).

⁷ See *id.*

⁸ 47 C.F.R. § 54.101(a)(1) and (b).

⁹ 47 C.F.R. § 54.101(a)(1).

designation area and will offer such service at rates that are reasonably comparable to urban rates.¹⁰

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.¹¹

Applicant further commits to provide these services consistent with the FCC’s High-Cost and Low-Income universal service support rules applicable to it.¹²

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.¹³

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.¹⁴

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.¹⁵ Applicant will offer and advertise its broadband and interconnected VoIP services, including those offerings that

¹⁰ 47 C.F.R. § 54.101(a)(2).

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

¹² *See* 47 C.F.R. §§ 54.101 and 54.201.

¹³ 47 C.F.R. § 54.201(d)(1).

¹⁴ *See* 47 C.F.R. §§ 54.101 and 54.201.

¹⁵ 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, Gibson EMC, 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.¹⁶

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.¹⁷

¹⁶ See Exhibit B.

¹⁷ 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.¹⁸ 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,”¹⁹ and will promote the efficient and effective use of federal universal service support, including RDOF Phase I support.

V. CONCLUSION

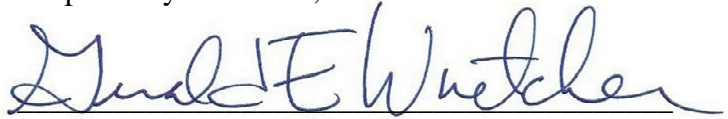
For the foregoing reasons, Gibson Connect respectfully requests that the Commission place this application at the head of the Commission’s docket and enter an Order **no later than May 1, 2021** designating Gibson Connect as a High-Cost and/or Low-Income ETC in the additional areas requested to ensure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

¹⁸ See 47 C.F.R. § 54.202(a)(2).

¹⁹ 47 U.S.C. § 1302(a).

Dated: January 6, 2021

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Gibson 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 6, 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 A1

**LIST OF CENSUS BLOCKS IN WHICH PETITIONER SEEKS EXPANDED
DESIGNATION AS A HIGH-COST AND LOW-INCOME (LIFELINE)
ELIGIBLE TELECOMMUNICATIONS CARRIER**

210399602001030	210759601002046	210759602002081	210759602004095
210399602001035	210759601002047	210759602003010	210759602004097
210399602001042	210759601002048	210759602003012	210759602004104
210399602001043	210759601002049	210759602003022	210759602004105
210399602001056	210759601002053	210759602003028	210759602004111
210399602001071	210759601002054	210759602003030	210759602004113
210399602001096	210759601002056	210759602003031	210759602004124
210399602001103	210759601002057	210759602004014	210759602004125
210399603002001	210759601002059	210759602004015	210759602004132
210399603002010	210759601002060	210759602004017	210759602004138
210399603002048	210759601002064	210759602004018	210759602004142
210399603002049	210759601002065	210759602004019	210759602004143
210399603002062	210759601002068	210759602004020	210759602004144
210759601002003	210759601002069	210759602004026	210759602004145
210759601002008	210759601002070	210759602004039	210759602004146
210759601002009	210759601002075	210759602004043	210759602004149
210759601002012	210759601002076	210759602004046	211059701001015
210759601002013	210759601002078	210759602004052	211059701001016
210759601002015	210759601002080	210759602004053	211059701001020
210759601002016	210759601002081	210759602004054	211059701001022
210759601002018	210759601002082	210759602004055	211059701001029
210759601002019	210759601002083	210759602004060	211059701001030
210759601002020	210759601002084	210759602004061	211059701001031
210759601002021	210759601002089	210759602004064	211059701001032
210759601002023	210759601002090	210759602004065	211059701001034
210759601002024	210759601002096	210759602004069	211059701001039
210759601002025	210759601002099	210759602004070	211059701001041
210759601002026	210759601002101	210759602004071	211059701001043
210759601002028	210759601002107	210759602004076	211059701001044
210759601002029	210759602002030	210759602004077	211059701001065
210759601002031	210759602002040	210759602004078	211059701001080
210759601002033	210759602002051	210759602004080	211059701001081
210759601002034	210759602002065	210759602004083	211059701001084
210759601002035	210759602002068	210759602004087	211059701001085
210759601002036	210759602002071	210759602004088	211059701001087
210759601002039	210759602002072	210759602004089	211059701001090
210759601002043	210759602002073	210759602004090	211059701001091
210759601002045	210759602002075	210759602004091	211059701001092

211059701001094	211059701001166	211059701003074	211059701004077
211059701001095	211059701001167	211059701003082	211059701004078
211059701001096	211059701001170	211059701003083	211059701004079
211059701001097	211059701001171	211059701003086	211059701004080
211059701001099	211059701001172	211059701003087	211059701004082
211059701001102	211059701003013	211059701003097	211059701004084
211059701001103	211059701003014	211059701003102	211059701004085
211059701001105	211059701003017	211059701004001	211059701004087
211059701001106	211059701003018	211059701004002	211059701004088
211059701001107	211059701003020	211059701004003	211059701004096
211059701001108	211059701003023	211059701004004	211059701004098
211059701001109	211059701003026	211059701004005	211059701004099
211059701001110	211059701003028	211059701004006	211059701004100
211059701001111	211059701003032	211059701004009	211059701004101
211059701001112	211059701003034	211059701004010	211059701004106
211059701001117	211059701003037	211059701004013	211059701006003
211059701001118	211059701003038	211059701004026	211059701006005
211059701001119	211059701003039	211059701004032	211059701006009
211059701001120	211059701003042	211059701004033	211059701006025
211059701001121	211059701003044	211059701004034	211059701006026
211059701001126	211059701003046	211059701004036	211059701006027
211059701001129	211059701003047	211059701004037	211059701006032
211059701001130	211059701003049	211059701004038	211059701006046
211059701001131	211059701003054	211059701004039	211059701006048
211059701001134	211059701003055	211059701004045	211059701006049
211059701001135	211059701003057	211059701004046	211059701006069
211059701001138	211059701003058	211059701004056	211059701006071
211059701001143	211059701003059	211059701004060	211059701006073
211059701001150	211059701003060	211059701004063	211059701006077
211059701001158	211059701003061	211059701004066	211059701006080
211059701001159	211059701003062	211059701004067	
211059701001160	211059701003067	211059701004068	
211059701001162	211059701003068	211059701004071	
211059701001163	211059701003070	211059701004072	
211059701001164	211059701003071	211059701004074	
211059701001165	211059701003072	211059701004076	

EXHIBIT A2

**LIST OF CENSUS BLOCKS IN WHICH PETITIONER
SEEKS DESIGNATION SOLELY AS A LOW-INCOME (LIFELINE)
ELIGIBLE TELECOMMUNICATIONS CARRIER**

211059701005099	210759602004006	210759601001027	210759601001024
210759601005008	210759602004150	210759601002023	210759602004089
211059701005098	210759602004152	210759601002084	210759602004047
210759601005014	210759602002079	210759602004058	210759602004057
210759601005012	210759602004144	210759601001021	210759602004143
210759602004120	210759602004133	210759602004145	210759602004090
210759601001045	210759602004013	210759601001076	210759601002033
210759602002008	210759602004139	210759601001041	210759602004043
210759602004121	210759602002031	210759602002072	210759601001044
210759602004111	210759601001069	210759602004092	210759602001019
210759602004004	210759601001072	210759602004155	210759602003009
210759602001020	210759602004138	210759602004126	210759602002066
210759602002032	210759602004048	210759602004072	210759602004062
210759602004123	210759602004153	210759601002047	210759601001025
211059701003058	210759602004073	210759602002075	210759602004147
210759602004140	210759601001034	210759602002076	210759602004037
210759602004093	210759602002074	210759602004014	210759601001050
210759602004078	210759601002041	210759602004122	210759602004114
210759602004084	210759602004118	210759602004166	210759602004020
210759602002059	210759602004041	210759601002050	210759601002039
210759601002045	210759602004049	210759602004135	210759602003031
210759602004060	210759602004131	210759602004017	210759601001039
210759602004106	210759602004033	210759602004080	210759601001066
210759601001031	210759601001043	210759602004082	210759602004081
210759602002017	210759602004019	210759602004031	210759602004088
210759601001047	210759602004052	210759602004002	210759602004010
210759602004105	210759601001046	211059701003060	210759602004102
210759602004059	210759602004094	210759602004101	210759602004009
210759602002027	210759602001018	210759601002058	210759602002077
210759602003030	210759602004095	210759602004137	210759601002037
210759601001028	210759602004124	210759601002046	210759601001049
210759601002030	210759602004163	210759602004151	210759601002025
210759601001071	210759602002078	210759602004067	210759602004053
210759602003035	210759601001048	210759602001002	210759601002056
210759602004050	210759602004032	210759602004069	210759602004064
210759602002060	210759602004125	210759601001023	210759601001032

Note: To the extent that any census blocks where Petitioner is seeking Lifeline-only ETC designation have been inadvertently excluded from Exhibit A2, Petitioner requests Lifeline-only ETC designation throughout its parent electric cooperative's, Gibson Electric Membership Corporation, entire electric service territory in Kentucky.

210759601001022	210759602002003	210759602004083	210759602004044
210759602004127	210759602004149	210759601002019	210759602004164
210759602004116	210759602002033	210759601002018	210759602004030
210759602004021	210759602002080	210759602004077	210759601001033
210759602004061	210759601002043	210759601002016	210759601002082
210759602004034	210759601002044	210759602004065	210759602002068
210759602004097	210759602004025	210759602002018	210759602004074
210759602001001	210759602002071	210759602002073	210759602004086
210759601002017	210759602004066	210759602002005	210759602004055
210759602004148	210759601001035	210759602002064	210759602001000
210759601002024	210759602004100	210759602002067	210759602002070
210759602004005	210759602004056	210759601002048	210759601002057
210759602003029	210759601001012	210759602003032	210759602004035
210759602004038	210759602003033	210759602002019	210759602004003
210759602002030	210759602002028	210759602002026	210759602002007
210759601002029	210759602004154	210759602004115	210759602004018
210759601001038	210759602004015	210759602004129	210759601002027
211059701003059	210759602002069	210759602004113	210759601002032
210759601001029	210759601001068	210759602004054	210759602004046
210759602004008	210759602004109	210759602004117	210759602004075
210759602004142	210759602004001	210759602004107	210759602004119
210759602004132	210759602004087	210759602004141	210759601002083
210759602003036	210759601002049	210759602002081	210759602004042
210759602004096	210759602002057	210759602004146	210759602004108
210759602004022	210759601002051	210759601002028	210759601001037
210759602004039	210759602002025	210759602004028	210759601001051
210759601002036	210759601002026	210759602004165	210759602004023
210759602002024	210759602004112	210759602004036	210759602004079
210759601001036	210759602002061	210759602004136	210759602002062
210759602001036	210759602002020	210759602004024	210759601001042
210759602004098	210759602004134	210759602002021	210759601001070
210759602004076	210759602002034	210759602004063	210759601001003
210759602004027	210759602004051	210759602003024	211059701005089
210759601001026	210759602004068	210759602004085	211059701005016
210759602002029	210759602004104	210759602004099	210759601002101
210759602004026	210759601002031	210759602002065	211059701003041
210759602004103	210759602004070	210759602002016	211059701003048
210759601001040	210759602004045	210759601002042	211059701004043
210759602004000	210759602004110	210759602004128	210759601002007
210759602004029	210759602003034	210759602004071	210759601002000
210759602004040	210759601002034	210759602004016	210830205003050
210759602004130	210759602004007	210759601001020	211059701005054

Note: To the extent that any census blocks where Petitioner is seeking Lifeline-only ETC designation have been inadvertently excluded from Exhibit A2, Petitioner requests Lifeline-only ETC designation throughout its parent electric cooperative's, Gibson Electric Membership Corporation, entire electric service territory in Kentucky.

211059701004089	211059701004096	210759601001077	211059701004095
210759601001054	211059701005041	210759601002077	211059701005082
210759601001002	211059701005078	211059701005048	210759601001006
210759601005003	210759601002060	211059701005013	211059701003085
211059701005053	211059701005050	211059701005036	210759601002004
210759601001019	211059701005032	211059701005043	211059701005080
211059701005018	211059701005047	211059701003055	210759601001053
211059701005071	211059701003050	210759601002081	211059701005051
211059701003046	211059701003036	210759601001007	211059701005087
211059701003038	210759601001064	210759601002011	211059701005012
210759601002088	210759601002062	210759601002003	211059701005065
210759601001011	211059701003037	211059701004092	211059701005085
211059701005021	211059701005066	211059701005092	211059701005063
211059701005083	210759601001008	210759601002100	210759601002002
211059701005028	211059701005093	211059701005062	210759601002102
210759601001062	211059701004094	211059701005072	210759601001017
210759601001055	211059701005023	210759601002008	211059701003049
210759601001056	210759601002070	210759601002067	210759601005013
210759601001059	211059701005055	210759601002005	210759601002014
211059701005005	211059701005090	211059701005011	210759601001016
211059701005105	211059701005086	211059701005033	211059701005076
211059701005034	211059701005003	211059701005029	210759601002076
211059701005052	211059701005101	211059701005094	210759601001030
211059701005079	211059701005084	210759601001005	210759601002064
211059701004091	211059701003065	210759601001004	211059701005100
210759601002009	211059701003056	210759601002013	211059701003057
210759601002098	211059701003063	211059701005020	210759601002099
210830205003059	211059701005045	211059701003061	211059701003064
211059701005026	211059701005095	210759601001063	210759601002080
211059701005064	211059701005024	210759601001073	210759601002071
211059701005042	210759601002075	211059701005035	211059701005046
211059701005070	211059701005039	210830205003060	211059701005081
210759601001058	210759601001065	210759601002015	211059701005014
210759601002087	210759601001060	210759601001015	210759601002068
210759601002065	210759601002093	210830205003057	210759601001074
211059701005025	210830205003062	210759601001013	211059701004041
211059701005067	210830205003063	211059701005075	211059701005058
211059701003029	210759601001001	210759601001014	211059701005097
211059701003054	211059701005091	210759601002059	211059701005102
210759601002091	210759601001018	211059701005010	211059701005068
210759601002074	210759601001061	211059701005044	211059701005015
210759601002010	211059701005040	211059701003040	211059701005038

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211059701005096	211059701003052	211059701004046	210759602002011
211059701003053	210759601002078	211059701001149	211059701003073
211059701003047	211059701005008	211059701006030	211059701001135
211059701003066	210759601002069	211059701001072	211059701004066
211059701003091	211059701005104	211059701001019	211059701001043
211059701004044	211059701005060	211059701004097	211059701004036
210759601002001	210759601002054	211059701003034	210830205001145
211059701005049	210759601002035	211059701003095	210399603002051
211059701003039	210759601002053	210830205001102	211059701003023
211059701003051	211059701001138	211059701004004	211059701003094
210830205003061	211059701001099	211059701001136	211059701003080
211059701005061	211059701001172	211059701001083	211059701002029
210759601001009	211059701001119	211059701001164	211059701001050
211059701005069	211059701001027	211059701001100	211059701001147
211059701005057	211059701001090	211059701001037	211059701004068
211059701003062	211059701005009	211059701003075	211059701004077
211059701003084	211059701005106	211059701002006	211059701001016
210759601005022	211059701003068	211059701003097	211059701006074
210759601002061	211059701002009	211059701003028	211059701001069
211059701005019	211059701003078	211059701002023	211059701003089
210759601002006	211059701001026	211059701003081	210830205001087
211059701005037	211059701004019	211059701002002	210830205001098
211059701005031	211059701004086	211059701004020	211059701003031
210830205003058	211059701002005	211059701001052	211059701001125
211059701005073	211059701003098	211059701001150	211059701001126
211059701005077	211059701004045	211059701001109	211059701004081
211059701005017	211059701004058	211059701004038	211059701004032
211059701005074	211059701004005	211059701004078	211059701001007
211059701005030	211059701004028	211059701001051	211059701001032
210759601005000	211059701001166	211059701004067	211059701001171
210759601002110	211059701001065	211059701001168	211059701003019
210759601002063	211059701004100	211059701001031	211059701003030
211059701005027	210830205001086	211059701001128	211059701003086
211059701005056	211059701001163	211059701004082	211059701003105
211059701005088	211059701001105	211059701004088	211059701003045
210759601002012	211059701001087	211059701004106	211059701002032
210759601002090	211059701001133	211059701001039	211059701003099
210759601001010	211059701005004	210399603001090	211059701004098
210759601002089	211059701002010	211059701003103	211059701001049
210759601001000	211059701002016	211059701001068	211059701004001
210759601002066	211059701004002	211059701001040	211059701004047
211059701005022	211059701004033	211059701001102	211059701004107

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211059701006085	211059701002003	211059701004011	211059701004030
211059701001066	211059701003074	211059701004083	211059701001023
211059701004015	211059701003083	211059701001045	211059701003070
211059701001103	211059701001111	211059701001017	211059701006084
211059701004063	211059701001094	211059701001101	211059701001008
211059701005000	211059701001098	211059701003044	211059701001070
211059701004014	211059701001086	211059701002020	211059701001025
211059701001097	211059701001117	211059701001169	211059701005001
211059701003077	211059701001044	211059701004071	211059701001015
211059701001013	211059701004010	210399603001086	211059701001029
211059701001127	211059701004079	210830205001091	210399603001088
210830205003007	211059701004076	211059701005103	211059701001085
211059701004080	211059701001022	211059701001042	211059701003088
211059701004039	211059701001014	211059701003069	211059701003072
210399603001087	211059701001010	211059701002007	211059701002019
211059701001009	211059701001158	211059701003104	211059701003079
211059701001134	211059701001131	211059701006078	211059701002022
211059701001089	211059701001107	211059701002030	211059701003087
211059701003035	211059701003020	211059701004042	211059701004065
211059701003106	211059701003024	211059701004090	211059701001024
211059701003025	211059701001143	211059701004018	211059701001076
211059701003090	211059701006045	211059701005006	211059701006086
211059701001067	211059701004003	211059701002031	210759602002082
211059701001082	211059701004093	211059701004072	211059701002008
210759602002022	211059701001123	211059701004029	211059701004013
211059701006000	211059701006069	211059701001162	210759602002015
211059701001130	210759602002013	211059701001106	211059701001047
211059701003006	211059701004035	211059701001096	211059701003067
211059701001091	211059701004000	211059701001165	211059701001092
211059701001034	211059701001161	211059701001167	211059701001110
211059701004085	211059701003093	210759602002012	211059701001035
211059701001122	211059701001159	210830205001147	211059701004101
211059701001120	210830205001094	210830205001103	210830205001093
211059701001046	210830205001097	211059701001170	211059701001018
211059701003092	211059701005007	211059701001041	211059701003107
211059701004006	211059701003022	211059701003026	211059701003032
211059701002001	211059701002015	211059701003042	211059701003082
211059701001074	211059701004008	211059701003071	211059701004016
210759602002014	211059701006080	211059701003027	211059701004069
211059701006087	211059701004040	211059701001132	211059701001084
211059701004102	211059701001124	211059701004007	211059701005002
211059701001036	211059701001038	211059701001139	211059701001146

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211059701006031	211059701001081	210399603002060	210399602001040
211059701003003	211059701003096	210399602001061	210399602001097
211059701001048	211059701001079	211059701006050	210399603002056
211059701004075	211059701002018	211059701006039	211059701006034
211059701001112	211059701004064	210399602001083	211059701006051
211059701004009	211059701004012	210399602001093	211059701006072
211059701004104	211059701006068	211059701006073	210399602001034
211059701001093	211059701004074	210399602001056	210759602002002
211059701001137	211059701001080	210759602002001	210399602001031
211059701004084	211059701002000	210399602001101	210399602001084
211059701004105	211059701003076	210399602001047	210399602001099
211059701004055	211059701001021	210079503002054	210399602001059
210830205001092	210399602001015	211059701006007	211059701006035
211059701001095	210399602001003	211059701006048	210399602001036
211059701001020	210399602001004	211059701006075	211059701006089
211059701001160	210399602001028	211059701006003	211059701006079
211059701001121	210399602001018	210399602002015	211059701006015
211059701003033	210399602001090	211059701006006	211059701006077
211059701003043	210399602001029	210399602001016	211059701006028
211059701002017	210399603002066	210399603002045	210399602001043
210830205001096	210399602001011	210399602001048	210399602001102
211059701002004	210079503002066	210399602001019	210399602001053
211059701001033	211059701006088	210399602001007	210399602001054
211059701004037	211059701006024	210399603002048	210399602001081
211059701004073	210399602001058	210399603002044	210399602001042
211059701001104	211059701006010	210399602001017	210759602002023
211059701001118	211059701006047	210399602001106	210079503002053
211059701003021	210399603002063	210399602001038	211059701006029
211059701002021	210399602002084	210399602002007	210399602001055
211059701001030	210399602001010	210399602001092	210399602001095
211059701001148	210399602001005	211059701006026	210759602002010
211059701001113	210399602001026	210399603002062	211059701006001
211059701001129	210399603002055	210399602001085	211059701006046
211059701004087	210079503002065	210399602001002	211059701006038
211059701004017	211059701006005	210079503002064	210399602001098
211059701004099	211059701006049	211059701006033	210399602001009
211059701004103	210399602001001	210399602001013	210399603002050
210830205001101	211059701006020	210759602002006	211059701006082
211059701001088	210399602001035	211059701006071	210399602001103
211059701001108	210399602002012	211059701006012	210399602001052
211059701001028	210399602001091	211059701006008	210759602002000
211059701001011	210399603002049	210399602001105	210399603002065

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210399602001100	210399603002054	210759601004026	210759601003028
210399602001008	211059701006037	210759601003022	210759601004000
211059701006009	210399602001000	210759601002095	210759601005070
210399602001032	210399602001039	210759601003016	210759601005043
210399602001096	210399603002009	210759601005057	210759601005058
210399602001045	210399602001021	210759601005026	210759601005035
211059701006002	210399602001051	210759601005054	210759601003048
211059701006004	210399603002059	210759601004058	210759601004007
210399603002057	211059701006081	210759601005007	210759601004028
211059701006027	210399602001033	210759601004061	210759601004039
210399602001037	210399602001012	210759601005032	210759601005031
210399602001060	211059701006022	210759601004041	210759601003006
210399602001082	210399602002013	210759601004025	210759601003013
211059701006044	211059701006021	210759601003012	210759601002107
210079503002047	210399602001104	210759601004031	210759601005040
210399602001057	210759602004161	210759601004047	210759601003015
210399602001006	210759602004158	210759601004049	210759601005049
210399603002020	210759602004159	210759601002073	210759601002108
211059701006076	210759602004156	210759601003049	210759601005027
211059701006023	210759602004162	210759601003032	210759601004038
210399602002014	210759602004157	210759601005065	210759601004035
210399602002092	210759601005067	210759601005024	210759601005048
210399602001020	210759601005064	210759601005011	210759601005019
210399603002010	210759601005059	210759601005005	210759601004070
211059701006032	210759601004068	210759601003031	210759601003038
211059701006083	210759601005063	210759601004053	210759601004011
210399603002042	210759601005073	210759601005021	210759601002072
210399602001014	210759601005074	210759601002094	210759601003008
211059701006011	210759601004064	210759601004017	210759601003009
211059701006070	210759601004071	210759601003046	210759601005069
210399602001094	210759601005075	210759601004045	210759601005047
210399602001041	210759601005068	210759601003000	210759601005038
210399602002085	210759601005060	210759601005036	210759601004056
211059701006025	210759601004072	210759601005002	210759601003050
210399603002053	210759601005071	210759601003017	210759601005029
210399602001049	210759601004067	210759601004051	210759601003020
210399602001044	210759601004012	210759601002118	210759601004030
210399602001050	210759601005023	210759601004066	210759601003052
210399602001027	210759601002106	210759601003053	210759601005056
210399603002022	210759601002116	210759601003011	210759601005034
210399603002061	210759601003040	210759601003030	210759601004003
210399602001030	210759601004043	210759601003027	210759601004018

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210759601005028	210759601002114	210759601004057	210759602001012
210759601005010	210759601003010	210759601004059	210759602002052
210759601005037	210759601003033	210759601004034	210759602003013
210759601002104	210759601004062	210759601004050	210759602002063
210759601002113	210759601003029	210759601004004	210759602001022
210759601005017	210759601005030	210759601003035	210759602001006
210759601003007	210759601004006	210759601005006	210759602001010
210759601004036	210759601003037	210759601003041	210759602003014
210759601004033	210759601004002	210759601004014	210759602002038
210759601004029	210759601004019	210759601002092	210759602002009
210759601004001	210759601005062	210759601003051	210759602003019
210759601004022	210759601003034	210759601003039	210759602004012
210759601004021	210759601005004	210759601004069	210759602003021
210759601004023	210759601005052	210759601005050	210759602003006
210759601005072	210759601002111	210759601005009	210759602001045
210759601004032	210759601005044	210759601004060	210759602003011
210759601003001	210759601003036	210759601005046	210759602001026
210759601003004	210759601004055	210759601003023	210759602002049
210759601005016	210759601003044	210759601004065	210759602001029
210759601003047	210759601002085	210759601003024	210759602003026
210759601004005	210759601003021	210759601004013	210759602002047
210759601002097	210759601002105	210759601004009	210759602002037
210759601003025	210759601005015	210759601004048	210759602001041
210759601003014	210759601004027	210759601002109	210759602001030
210759601005055	210759601004008	210759601005042	210759602003020
210759601005051	210759601005033	210759601003026	210759602003015
210759601002112	210759601002096	210759601004015	210759602003028
210759601003005	210759601005025	210759601005053	210759601001075
210759601004044	210759601004024	210759601003045	210759601002055
210759601004054	210759601004016	210759601004052	210759602003023
210759601003042	210759601004042	210759601002117	210759602002054
210759601003043	210759601002086	210759602001033	210759602002050
210759601005020	210759601003018	210759602001031	210759601002040
210759601004046	210759601005018	210759602003018	210759602004011
210759601004037	210759601002103	210759602001007	210759602001025
210759601004063	210759601003003	210759602001040	210759602002044
210759601002115	210759601004040	210759602001011	210759602002036
210759601005045	210759601003019	210759602002035	210759602002039
210759601003002	210759601005001	210759602001027	210759602002046
210759601005066	210759601004010	210759602001014	210759602002053
210759601004020	210759601005039	210759602001024	210759601002079
210759601005061	210759601005041	210759602001021	210759602003017

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210759602001023	210759602002042	211059701006036	211059701006016
210759602003010	210759602003027	211059701003000	211059701001152
210759601002022	210759602003000	211059701001151	211059701004059
210759601002038	210759602003001	211059701002034	211059701003002
210759602004091	210759602003004	211059701003102	211059701003012
210759602002004	210759602001003	211059701004022	211059701002025
210759602003002	210759602002041	211059701006018	211059701004052
210759602001013	210759602003008	211059701003100	211059701003016
210759602001004	210759601002021	211059701001157	211059701004054
210759602001016	210759602003016	211059701003010	211059701003004
210759602001034	210759602001015	211059701002012	211059701006063
210759602003005	211059701002011	211059701003005	211059701003008
210759602001046	211059701003009	211059701004049	211059701006062
210759601001067	211059701004057	211059701006055	211059701002027
210759602003022	211059701001141	211059701006017	211059701004062
210759602001008	211059701004031	211059701004024	211059701004023
210759602001044	211059701003001	211059701002033	211059701006059
210759602001005	211059701002036	211059701002014	211059701006067
210759602001009	211059701004061	211059701004050	211059701004048
210759602002048	211059701004051	211059701004053	211059701003011
210759602002040	211059701006052	211059701002035	211059701006053
210759602002045	211059701004034	211059701001140	210759601001052
210759602002043	211059701002037	211059701001142	210759601001057
210759602002055	211059701001144	211059701006013	210399603002058
210759602002056	211059701004060	211059701001154	210399603002037
210759602002058	211059701003017	211059701004027	210399603001030
210759602002051	211059701002039	211059701006066	210079503003039
210759602003003	211059701006054	211059701006014	210079503003036
210759602001032	211059701006060	211059701006064	210079503002056
210759602001039	211059701004026	211059701003007	210079503002030
210759602001017	211059701006065	211059701004025	210079503002050
210759602001038	211059701003013	211059701002028	210079503002026
210759602001035	211059701002038	211059701004056	210399602001064
210759602001043	211059701002026	211059701006061	210399602001071
210759602001028	211059701006056	211059701006058	210399602002089
210759602003007	211059701001156	211059701001155	210399602002058
210759602003012	211059701004070	211059701002024	210399602002088
210759602003025	211059701001153	211059701003014	210079503002023
210759601002020	211059701004021	211059701003018	210399602002052
210759601002052	211059701006019	211059701001145	210079503003024
210759602001042	211059701003101	211059701006057	210399603002032
210759602001037	211059701003015	211059701002013	210079503002018

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210079503002062	210399603002008	210079503002060	210399602002011
210079503002038	210399603002029	210399602001072	210399602001087
210079503002068	210399603002014	210399602002020	210399602001086
210079503002040	210399602002005	210079503003042	210399603002017
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210399603002046	210399602002083	210079503003031	210079503003028
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210079503002019	210079503003043	210399603002041	210399602002080
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210399602001088	210079503002041	210079503002058	210399602002060
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210399603002024	210399602001078	210399602002023	210399602002006
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210399603002030	210399603002004	210399603002067	210079503003047
210079503003025	210399602001062	210079503003050	210079503003045
210079503002033	210399602002001	210399603002012	210079503003038
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210399602002026	210399602002056	210079503003057	210079503002057
210399602002065	210399603002000	210399603002005	210079503002016
210399603002028	210399603002038	210399603002043	210079503002024
210079503002010	210399603002035	210399603001089	210399602002066
210399602002029	210079503003048	210399603002018	210399602002090
210399602002024	210079503003021	210399603002015	210079503002052
210399603002034	210079503002027	210079503003003	210399602002021
210399603002016	210079503003019	210079503002028	210079503003033
210079503003026	210079503002021	210399603002033	210399603002025
210079503003060	210079503002036	210399603002023	210399603002006
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210399602001079	210399602002079	210079503002035	210399603001029
210079503002059	210079503002055	210399602001068	210399603002013
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210399603001082	210399602001077	210399602001046	210079503002029
210399603001028	210399602002028	210399602002053	210399602002041
210079503003040	210079503003055	210399602002018	210079503002042
210079503003054	210079503003035	210399602002068	210399602002077

Note: To the extent that any census blocks where Petitioner is seeking Lifeline-only ETC designation have been inadvertently excluded from Exhibit A2, Petitioner requests Lifeline-only ETC designation throughout its parent electric cooperative's, Gibson Electric Membership Corporation, entire electric service territory in Kentucky.

210399602002063 210399602001107
210079503003059
210079503002015
210399603001083
210399603002040
210399602001089
210399603002021
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210079503003008
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210399602002054
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210399602002074
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210079503002031
210399602001067
210399602002082
210399602002091
210399602002076
210399603001091
210399603002027
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210079503003052
210079503002039
210079503002043
210399602002027
210399602001076
210399602002086
210399602002069

Note: To the extent that any census blocks where Petitioner is seeking Lifeline-only ETC designation have been inadvertently excluded from Exhibit A2, Petitioner requests Lifeline-only ETC designation throughout its parent electric cooperative's, Gibson Electric Membership Corporation, entire electric service territory in Kentucky.

EXHIBIT B

AFFIDAVIT OF CHARLES L. PHILLIPS, P.E.

STATE OF TENNESSEE)
) SS.
COUNTY OF GIBSON)

Charles L. Phillips, P.E., after being duly sworn, states the following:

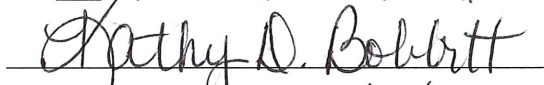
1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.
2. I am the Vice President of Technical Services of Gibson Electric Membership Corporation and Vice President of Operations of its wholly-owned direct subsidiary, Gibson Connect, LLC ("Petitioner"). 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.



Charles L. Phillips, P.E.
Vice President of Operations
Gibson Connect, LLC

County of Gibson
State of Tennessee

The foregoing instrument was acknowledged before me this 4 day of January, 2021, by Kathy D. Bobbitt



My commission expires: 5/11/21

