

BEFORE THE
KENTUCKY PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

Electronic Petition Of AT&T Kentucky)	
For An Order Confirming)	
The Relinquishment of Eligible)	Case No. 2021-00375
Telecommunications Carrier Designation)	
In Specified Areas)	

**PETITION FOR ORDER CONFIRMING RELINQUISHMENT OF ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION IN SPECIFIED AREAS**

Pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, AT&T Kentucky¹ (“AT&T” or “AT&T Kentucky”) respectfully petitions the Kentucky Public Service Commission (“Commission”) for an order confirming relinquishment of AT&T Kentucky’s Eligible Telecommunications Carrier (“ETC”) designation in specified areas of Kentucky, effective February 15, 2022.

AT&T Kentucky requests an order by December 1, 2021 so that it can implement its relinquishment on February 15, 2022.

I.
SUMMARY

1. AT&T Kentucky is an incumbent local exchange carrier (“ILEC”) providing telecommunications services as that term is defined by federal law. *See, e.g.*, 47 U.S.C. § 251(h)(1).

¹ BellSouth Telecommunications, LLC d/b/a AT&T Kentucky. BellSouth Telecommunications, LLC is a Georgia limited liability company that was organized on July 1, 1991 and first authorized to transact business in the Commonwealth on November 11, 1991. It is in good standing in the State of Georgia and remains authorized to transact business in the Commonwealth of Kentucky. *See Exhibit C.*

2. By this Petition, AT&T Kentucky is relinquishing its ETC designation for all the remaining areas in which it is currently designated as an ETC (the Relinquishment Area”). This is AT&T Kentucky’s right under federal law because every part of the relinquishment area is served by at least one other ETC.

3. Federal law provides an objective standard for ETC relinquishment: a state commission “shall permit” an ETC to relinquish its ETC designation “in any area” so long as that area is served by more than one ETC.² AT&T Kentucky’s ETC relinquishment more than meets this controlling standard, because every wire center in the Relinquishment Area is served by at *least thirteen*, and in some instances *seventeen*, other ETCs.

4. *AT&T Kentucky is not discontinuing any service by virtue of this Petition.* AT&T Kentucky’s relinquishment will not affect the availability of any AT&T legacy voice service anywhere in AT&T Kentucky’s service territory. AT&T Kentucky will continue to offer and provide legacy voice services in all of its service territory (including in the Relinquishment Area), and it will continue to comply with applicable service obligations of federal and state law in its service territory (including in the Relinquishment Area), unless and until it separately obtains any necessary permission to stop providing retail legacy voice service.³

5. Consumers will not be impacted by this relinquishment. The federal voice Lifeline discount is currently scheduled to be reduced to \$0 on December 1, 2021, in all areas with more than one Lifeline provider.⁴ Because there are at least thirteen other ETCs in all areas in which AT&T Kentucky is relinquishing its ETC designation, the federal voice Lifeline discount should be reduced to \$0 on December 1, 2021, throughout the Relinquishment Area. As AT&T

² 47 U.S.C. §214(e)(4).

³ AT&T Kentucky’s obligations associated with receiving CAF II support ends on December 31, 2021.

⁴ See 47 CFR 54.403(a)(2)(iv) and (v).

Kentucky's requested relinquishment effective date is February 15, 2022, the federal voice Lifeline discount will already have been removed from AT&T Kentucky's few remaining Lifeline customers (as of June 2021 AT&T Kentucky's total lifeline customer count was only 131).⁵

AT&T Kentucky also will no longer have an obligation to provide a Lifeline discount on broadband internet access service after December 31, 2021.⁶ However, customers that are eligible will still be able to receive the temporary Emergency Broadband Benefit for qualifying broadband plans. Consistent with previous changes to the federal Lifeline discount, AT&T Kentucky will provide ample notice to affected customers.

6. In 2018, the Commission approved AT&T Kentucky's petition to relinquish its ETC designation for roughly 87.5%⁷ of the AT&T Kentucky service territory in Kentucky where it was not participating in the Federal Communications Commission ("FCC") Connect America Fund Phase II ("CAF II") program.⁸ The remaining 12.5% of AT&T Kentucky's service territory consists of census blocks that were eligible for CAF II funding (the "CAF II Census Blocks").⁹ A condition of participating in the CAF II program was that AT&T Kentucky remain designated as

⁵ If the Federal Communications Commission ("FCC") does not eliminate the voice Lifeline discount on December 1, 2021, the only consumer impact of this relinquishment is that consumers in the relinquishment area will no longer be able to receive a Lifeline discount on voice service from AT&T Kentucky. From 2008 through 2020, AT&T Kentucky's Lifeline subscribership shrank by more than 99%, as consumers have chosen to receive their Lifeline discount from other ETCs, mostly wireless carriers. *In fact, by the end of 2020, AT&T served less than 0.08% percent of Kentucky's Lifeline subscribers.*

⁶ See AT&T Notice for Forbearance from Lifeline BIAS Requirements, *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, July 29, 2021 (filing effective January 1, 2022).

⁷ Based on the number of CAF II Census Blocks, defined herein, as compared to the total number of census blocks in AT&T's service territory.

⁸Order, *In the Matter of: Petition Of AT&T Kentucky For Order Confirming Relinquishment of Eligible Telecommunications Carrier Designation In Specified Areas*, Case No. 2017-00416 (March 23, 2018) ("AT&T Partial Relinquishment Order").

⁹The Wire Centers containing the CAF II Census Blocks were provided in Exhibit B to AT&T Kentucky's October 20, 2017 Petition in the AT&T Partial Relinquishment Case.

an ETC in the CAF II Census Blocks, which AT&T Kentucky has done since the Commission's 2018 *AT&T Partial Relinquishment Order*.

7. By this Petition, AT&T Kentucky now relinquishes its ETC designation for all of the remaining areas in which it currently is designated an ETC ("the relinquishment area").

II. BACKGROUND

8. AT&T Kentucky is an incumbent local exchange carrier ("ILEC") in Kentucky. On November 26, 1997, the Commission granted AT&T's request, pursuant to 47 U.S.C. § 214(e)(1), for designation as an ETC within its ILEC service area.¹⁰

9. On March 23, 2018, the Commission granted AT&T Kentucky's request to relinquish its ETC designation for areas in Kentucky where it was not participating in CAF II. Since that time, AT&T Kentucky has remained an ETC in a small portion of its local exchange service territory identified in its original relinquishment petition.

10. Historically, AT&T Kentucky as an ETC was eligible to receive federal universal service funding in accordance with 47 U.S.C. § 254, in exchange for which it has been required to offer supported services pursuant to 47 C.F.R. § 54.201(d) and meet the obligations associated with the universal service programs in which it participates.¹¹ Since its inception, federal universal service funding has included "high cost" support to deploy and maintain networks in rural and other high-cost areas, as well as reimbursement from the federal Lifeline program for offering local telecommunications services to eligible low-income consumers at discounted prices.

¹⁰ See, *In the Matter of: An Inquiry into Local Competition, Universal Service, and the Non-Traffic Sensitive Access Rate, and Inquiry into Universal Service and Funding Issues*, Case Nos. 355, 360 (November 26, 1997).

¹¹ See 47 U.S.C. § 214(e)(1).

11. In 2015, the FCC started disbursing high cost universal service support to AT&T pursuant to a new approach.¹² For price cap carriers like AT&T, the restructured program, referred to as CAF II, provided funding by census blocks rather than by larger areas such as wire centers or service areas. Price cap carriers that accepted model-based CAF II funding were obligated to: (a) remain an ETC in the CAF II Census Blocks;¹³ and, (b) offer the Lifeline discount to eligible customers who reside in CAF II Census Blocks. CAF II funding support was offered to carriers for six years with an option to extend support for a seventh year. AT&T accepted CAF II support in Kentucky¹⁴ and elected to receive a seventh year of support, so it will receive CAF II support through December 31, 2021.¹⁵

12. The FCC replaced the model-based CAF II support program with the Rural Digital Opportunity Fund (“RDOF”).¹⁶ The Phase I auction for the RDOF started on October 29, 2020 and concluded on November 25, 2020.¹⁷ AT&T did not participate in the RDOF Phase I auction and, therefore, will no longer receive any federal high cost universal service support in Kentucky after December 31, 2021.

¹² See generally Report and Order, *Connect America Fund*, 29 FCC Rcd. 15644 (2014); Report and Order and Further Notice of Proposed Rulemaking, *Connect America Fund*, 26 FCC Rcd. 17663 (2011) (subsequent history omitted).

¹³ In addition to identifying specific census blocks as eligible for CAF II funding, the FCC also allowed AT&T to use CAF II support in “Extremely High Cost” census blocks to meet its CAF II broadband commitments. See 47 C.F.R. § 54.310(c)(1).

¹⁴ See August 27, 2015 Letter from James Cicconi in FCC Docket No. 10-90. AT&T did not make this decision lightly – it declined the FCC’s offer of CAF II funding in three of the twenty-one states in which it is a traditional wireline ILEC (Missouri, Nevada and Oklahoma).

¹⁵ See Letter from Susanna Biancheri, AT&T, to Marlene Dortch, FCC, WC Docket No. 10-90 (filed Sept. 23, 2020) (accepting a seventh year of CAF II support in Kentucky and seventeen other states).

¹⁶ See generally, Report and Order, *Rural Digital Opportunity Fund*, 35 FCC Rcd 686 (2020).

¹⁷ See, e.g., *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced*, FCC Form 683 Due January 29, 2021, Public Notice, DA 20-1422 (rel. Dec. 7, 2020).

III.
SCOPE OF AT&T KENTUCKY'S RELINQUISHMENT

13. Because AT&T Kentucky will no longer receive any federal high cost universal service support in Kentucky, AT&T Kentucky seeks an order confirming relinquishment of its ETC status in its entirety in the State of Kentucky, specifically in the relinquishment area which consists of the CAF II Census Blocks identified in **Exhibit A** hereto.

14. *This filing will not authorize AT&T Kentucky to withdraw any of its underlying legacy voice services.* AT&T Kentucky will continue to fulfill any retail service obligations imposed by non-ETC provisions in state or federal law, unless and until AT&T Kentucky separately obtains any necessary permission to stop providing such service. All customers in the relinquishment area will have access to services offered by AT&T Kentucky at standard AT&T prices, including all applicable surcharges, fees and taxes. Finally, AT&T Kentucky's relinquishment will not affect either the ability of other ETCs to participate in federal universal service programs or the amount of support available in Kentucky.

IV.
LEGAL STANDARD

15. In 47 U.S.C. § 214(e)(2) and (4) and 47 C.F.R. § 54.205, Congress and the FCC delegated authority to state commissions to designate carriers as ETCs and permit carriers to relinquish their ETC designation. The standard for relinquishing an ETC designation is set forth in 47 U.S.C. § 214(e)(4), which states, in pertinent part:

A State commission...**shall permit an eligible telecommunications carrier to relinquish its designation** as such a carrier **in any area served by more than one eligible telecommunications carrier.** An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission...of such relinquishment.¹⁸

¹⁸ (Emphasis added). 47 U.S.C. § 214(e)(4) also provides, in part:

The law does not treat relinquishment of an ETC designation by an ILEC any differently than relinquishment by other designated ETCs, *and the Commission has previously allowed relinquishment of ETC designations*, including by AT&T Kentucky.¹⁹

V.

AT&T KENTUCKY IS ENTITLED TO RELINQUISH ITS ETC DESIGNATION

16. AT&T Kentucky meets the standard for relinquishing its ETC designation because, as set forth in **Exhibit A**, all portions of the relinquishment area have at least thirteen other ETCs, and in some instances as many as seventeen other ETCs, designated and approved by the Commission.²⁰ To AT&T Kentucky's knowledge, each of these providers remains designated an ETC in the areas designated in **Exhibit A**. As a designated ETC, each of these providers is obligated to comply with the applicable Lifeline requirements, and many consumers are already receiving Lifeline discounts from these other ETCs.

VI.

CUSTOMER NOTICE

17. Based on the federal rules currently in place, notice should not be required for Lifeline customers as a result of this petition as the federal voice Lifeline discount will be reduced

Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission...shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier.

This language is inapplicable to this Petition because, as noted in Section III, AT&T will not discontinue *any* service as a result of the Commission granting this Petition.

¹⁹ See *AT&T Partial Relinquishment Order*.

²⁰ The following providers have been designated as an ETC on a census block basis; these census blocks overlap, at least in part, with the relinquishment area but are not included in Exhibit A: Altice USA, Inc., CCO Holdings, LLC, Cellular Services LLC., Cincinnati Bell Inc., Co-op Connections Consortium, Peoples Telecom, LLC, RDOF USA Consortium, Rural Electric Cooperative Consortium, Space Exploration Technologies Corp., Tennessee Cooperative Group Consortium, Windstream Services LLC, Debtor-In-Possession.

to \$0 on December 1, 2021, and AT&T Kentucky will no longer have any CAF II obligations as of January 1, 2022.²¹

If the federal rules change and support for a Lifeline discount on voice service continues after December 1, 2021, AT&T Kentucky will ensure that its remaining voice Lifeline customers receive ample notice of the need to select another ETC in order to continue receiving the federal voice Lifeline discount. At least 60 days prior to the relinquishment effective date, AT&T Kentucky will provide notice in a separate letter via U.S. Mail to each of its affected Lifeline customers explaining that AT&T Kentucky will no longer offer the federal Lifeline discount, and if the customer does not choose another Lifeline provider, AT&T Kentucky's standard prices (including applicable surcharges, fees and taxes) will apply to the customer's existing AT&T service. AT&T Kentucky also will send each remaining affected Lifeline customer a second notice letter and a bill message at least 15 days prior to the relinquishment date. All notices will inform each affected customer that the federal voice Lifeline discount can be obtained from the remaining ETCs in the area and will inform affected customers how to contact the Universal Service Administrative Company ("USAC") to obtain a list of other ETCs in the state and obtain answers to general questions about Lifeline. **Exhibit B** is a sample of the language of these letters.

18. If the FCC extends the voice Lifeline benefit beyond December 1, 2021, to avoid customer confusion and assist with a smooth transition process, AT&T Kentucky will stop enrolling Kentucky customers in the federal voice Lifeline program on December 1, 2021, or five

²¹ For any Lifeline discount (voice and broadband) that ends prior to the relinquishment effective date, AT&T Kentucky will separate and, apart from this Petition, provide notice to any affected Lifeline customers of the change.

days after the Commission issues an Order, whichever is later. This approach is consistent with the Commission's previous approval.²²

VII.
REQUESTED ORDER DATE

19. AT&T Kentucky requests that the Commission issue an order granting this Petition as soon as possible, but no later than **December 1, 2021**.

CONCLUSION

For the foregoing reasons, AT&T Kentucky respectfully requests that the Commission grant this Petition expeditiously and issue an order confirming AT&T Kentucky's relinquishment of its ETC designation in the relinquishment area in Kentucky, effective February 15, 2022.

Respectfully submitted this 21st day of September, 2021.

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²² See Case No. 2017-00416, *Order In The Matter of Petition of AT&T Kentucky for Order Confirming Relinquishment of Eligible Telecommunications Carrier Designation In Specified Areas* (Ky. P.S.C. Mar. 23, 2018).

EXHIBIT A

EXHIBIT A**AT&T Kentucky Lifeline Customers
CETCs Designated in AT&T Kentucky's Service Area (ILEC Wire Centers)**

Wire Center CLLI	Exchange	No. of AT&T Lifeline Customers*	Other Designated ETC**
AURRKYMA	AURORA		1,2,3,4,8,10,12,16,17,18,19,20,21,22
BDFRKYMA	BEDFORD		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
BGDDKYMA	BAGDAD		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
BLFDKYMA	BLOOMFIELD		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
BLSPKYMA	BLUFF SPRINGS	1	1,2,3,4,6,8,10,12,16,18,19,20,21,22
BNLYKYMA	BENHAM-LYNCH		1,2,3,4,5,8,10,12,16,18,19,20,21,22
BNTNKYMA	BENTON		1,2,3,4,6,8,10,12,13,15,16,17,18,19,20,21,22
BRGNKYMA	BURGIN		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
BRMNKYMA	BREMEN		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
BRTWKYES	BARDSTOWN	2	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
BVDMKYMA	BEAVER DAM	5	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
BWLGKYMA	BOWLING GREEN	1	1,2,3,4,6,8,12,15,16,18,19,20,21,22
BWLGKYMA	WOODBURN		1,2,3,4,6,8,12,15,16,18,19,20,21,22
BWLGKYRV	BOWLING GREEN		1,2,3,4,6,8,12,15,16,18,19,20,21,22
BYVLKYMA	BEATTYVILLE	9	1,2,3,4,5,8,10,12,14,16,18,19,20,21,22
CADZKYMA	CADIZ	2	1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
CHPLKYMA	CHAPLIN	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CLAYKYMA	CLAY		1,2,3,4,8,10,12,16,17,18,19,20,21,22
CLHNKYMA	CALHOUN		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CLPTKYMA	CLOVERPORT	2	1,2,3,4,8,10,12,16,18,19,20,21,22
CLTNKYES	CLINTON		1,2,3,4,8,10,12,16,17,18,19,20,21,22
CMBGKYMA	CAMPBELLSBURG		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CNCYKYMA	CENTRAL CITY		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CNTNKYMA	CANTON	2	1,2,3,4,6,8,10,12,16,17,18,19,20,21,22
CNTWKYMA	CENTERTOWN		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
COTNKYMA	CROFTON	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CRBNKYMA	CORBIN	1	1,2,3,4,5,8,10,12,15,16,18,19,20,21,22
CRBOKYMA	CRAB ORCHARD	3	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CRLSKYMA	CARLISLE		1,2,3,4,6,8,10,12,16,18,19,20,21,22
CRTNKYMA	CARROLLTON	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CYDNKYMA	CORYDON		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
CYNTKYMA	CYNTHIANA		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
DAVLKYMA	DANVILLE	1	1,2,3,4,8,10,12,15,16,18,19,20,21,22
DIXNKYMA	DIXON		1,2,3,4,8,10,12,16,17,18,19,20,21,22
DRBOKYES	DRAKESBORO		1,2,3,4,6,8,10,12,16,18,19,20,21,22
DWSPKYES	DAWSON SPRINGS	1	1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
EDVLKYMA	EDDYVILLE		1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
EKTNKYMA	ELKTON	3	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22

* AT&T's Lifeline customer counts are as of the end of June 2021.

** The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit.

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CETCs Designated in AT&T Kentucky's Service Area (ILEC Wire Centers)**

Wire Center CLLI	Exchange	No. of AT&T Lifeline Customers*	Other Designated ETC**
ELCYKYES	ELKHORN CITY	1	1,2,3,4,5,8,10,12,16,18,19,20,21,22
EMNNKYES	EMINENCE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
EMNNKYPL	CROPPER		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
EMNNKYPL	EMINENCE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
ENSRKYMA	ENSOR		1,2,3,4,6,8,12,15,16,18,19,20,21,22
ERTNKYMA	EARLINGTON		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
FDCKKYES	FEDSCREEK		1,2,3,4,5,8,10,12,16,18,19,20,21,22
FDVLKYMA	FORDSVILLE	2	1,2,3,4,8,10,12,16,18,19,20,21,22
FEBRKYMA	FREEBURN		1,2,3,4,5,8,10,12,16,18,19,20,21,22
FEBRKYMA	MCCARR		1,2,3,4,5,8,10,12,16,18,19,20,21,22
FKLNKYMA	FRANKLIN	3	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
FLTNKYMA	CAYCE		1,2,3,4,8,12,15,16,18,19,20,21,22
FLTNKYMA	FULTON		1,2,3,4,8,12,15,16,18,19,20,21,22
FLTNKYMA	WATER VALLEY	1	1,2,3,4,8,12,15,16,18,19,20,21,22
FNVLYKYMA	FINCHVILLE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
FORDKYMA	FORD		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
FRDNKYMA	FREDONIA		1,2,3,4,6,8,10,12,16,17,18,19,20,21,22
FRFTKYES	FRANKFORT		1,2,3,4,6,8,12,15,16,18,19,20,21,22
FRFTKYMA	FRANKFORT	1	1,2,3,4,6,8,12,15,16,18,19,20,21,22
GBVLKYMA	GILBERTSVILLE		1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
GHNTKYMA	GHENT	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
GNVLYKYMA	GREENVILLE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
GRACKYMA	GRACEY		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
GRTWKYMA	GEORGETOWN		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
GTHRKYMA	GUTHRIE		1,2,3,4,6,8,10,12,16,18,19,20,21,22
HABTKYMA	HABIT	1	1,2,3,4,6,8,12,15,16,18,19,20,21,22
HANSKYMA	HANSON		1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
HBVLKYMA	HEBBARDSVILLE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
HCMNKYMA	HICKMAN		1,2,3,4,6,8,10,12,16,17,18,19,20,21,22
HDBGKYMA	CORNISHVILLE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
HDBGKYMA	HARRODSBURG		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
HNSNKYMA	HENDERSON		1,2,3,4,6,8,12,15,16,18,19,20,21,22
HPVLKYMA	HOPKINSVILLE		1,2,3,4,8,12,15,16,18,19,20,21,22
HRBGKYES	HARDINSBURG		1,2,3,4,8,10,12,16,18,19,20,21,22
HRFRKYMA	HARTFORD		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
HRLNKYMA	HARLAN	4	1,2,3,4,5,8,10,12,15,16,18,19,20,21,22
HWVLKYMA	HAWESVILLE	3	1,2,3,4,6,8,10,12,16,18,19,20,21,22
INEZKYMA	INEZ	1	1,2,3,4,5,8,10,12,16,18,19,20,21,22

* AT&T's Lifeline customer counts are as of the end of June 2021.

** The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit.

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CETCs Designated in AT&T Kentucky's Service Area (ILEC Wire Centers)**

Wire Center CLLI	Exchange	No. of AT&T Lifeline Customers*	Other Designated ETC**
ISLDKYMA	ISLAND		1,2,3,4,6,8,10,12,16,18,19,20,21,22
JCSNKYMA	JACKSON	8	1,2,3,4,5,8,10,12,16,18,19,20,21,22
JLLCTNMA	JELICO		1,2,3,4,5,8,10,12,16,18,19,20,21,22
JNCYKYMA	JUNCTION CITY		1,2,3,4,6,8,10,12,16,18,19,20,21,22
KKVLKYMA	KIRKSVILLE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
LBJTKYMA	LEBANON JUNCTION		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
LFYTKYMA	LAFAYETTE		1,2,3,4,6,8,12,16,17,18,19,20,21,22
LGRNKYES	LAGRANGE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LRBGKYMA	LAWRENCEBURG	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
LSVLKY26	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYAN	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYAP	LOUISVILLE		1,2,3,4,8,12,15,16,18,19,20,21,22
LSVLKYBE	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYCW	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYFC	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYHA	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYJT	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYO	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYSM	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYVS	LOUISVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
LSVLKYWE	LOUISVILLE		1,2,3,4,8,12,15,16,18,19,20,21,22
LVMRKYMA	LIVERMORE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
MACEKYMA	MACEO		1,2,3,4,6,8,12,15,16,18,19,20,21,22
MARNKYMA	MARION	1	1,2,3,4,8,10,12,16,17,18,19,20,21,22
MCDNKYMA	MCDANIELS	3	1,2,3,4,8,10,12,16,18,19,20,21,22
MCWLKYMA	MCDOWELL	1	1,2,3,4,5,8,10,12,16,18,19,20,21,22
MDBOKYMA	MIDDLESBORO	1	1,2,3,4,5,6,8,10,12,16,18,19,20,21,22
MDVIKYMA	MADISONVILLE		1,2,3,4,8,10,12,15,16,17,18,19,20,21,22
MGFDKYMA	MORGANFIELD	1	1,2,3,4,8,10,12,15,16,17,18,19,20,21,22
MGTWKYMA	MORGANTOWN	5	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
MLBGKYMA	MILLERSBURG		1,2,3,4,6,8,10,12,16,18,19,20,21,22
MLTNKYMA	MILTON		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
MRGPKYMA	MORTONS GAP		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
MRRYKYMA	MURRAY	1	1,2,3,4,6,8,10,12,13,15,16,17,18,19,20,21,22
MTEDKYMA	MOUNT EDEN	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
MTSTKYMA	MOUNT STERLING	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
MYFDKYMA	MAYFIELD		1,2,3,4,8,10,12,13,15,16,17,18,19,20,21,22
MYVLKYMA	MAYSVILLE	1	1,2,3,4,8,10,12,16,18,19,20,21,22

* AT&T's Lifeline customer counts are as of the end of June 2021.

** The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit.

EXHIBIT A**AT&T Kentucky Lifeline Customers
CETCs Designated in AT&T Kentucky's Service Area (ILEC Wire Centers)**

Wire Center CLLI	Exchange	No. of AT&T Lifeline Customers*	Other Designated ETC**
NEBOKYMA	NEBO	1	1,2,3,4,8,10,12,15,16,17,18,19,20,21,22
NEONKYES	NEON		1,2,3,4,5,8,10,12,16,18,19,20,21,22
NRVLKYMA	NORTONVILLE	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
NWHNKYMA	NEW HAVEN		1,2,3,4,6,8,10,12,16,18,19,20,21,22
OKGVKYES	OAK GROVE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
OWBOKYMA	OWENSBORO		1,2,3,4,8,12,15,16,18,19,20,21,22
OWTNKYMA	NEW LIBERTY	2	1,2,3,4,6,8,12,16,18,19,20,21,22
OWTNKYMA	OWENTON	2	1,2,3,4,6,8,12,16,18,19,20,21,22
PARSKYMA	LITTLE ROCK		1,2,3,4,6,8,12,15,16,18,19,20,21,22
PARSKYMA	NORTH MIDDLETOWN		1,2,3,4,6,8,12,15,16,18,19,20,21,22
PARSKYMA	PARIS		1,2,3,4,6,8,12,15,16,18,19,20,21,22
PDCHKYIP	PADUCAH		1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
PDCHKYLO	PADUCAH		1,2,3,4,6,8,10,12,13,15,16,17,18,19,20,21,22
PDCHKYMA	PADUCAH		1,2,3,4,8,10,12,13,15,16,17,18,19,20,21,22
PDCHKYRL	PADUCAH		1,2,3,4,6,8,10,12,13,15,16,17,18,19,20,21,22
PDCHKYRL	SYMSONIA		1,2,3,4,6,8,10,12,13,15,16,17,18,19,20,21,22
PIVLKYMA	PINEVILLE	4	1,2,3,4,5,6,8,10,12,15,16,18,19,20,21,22
PKVLKYMA	PIKEVILLE		1,2,3,4,5,6,8,10,12,15,16,18,19,20,21,22
PKVLKYMT	PIKEVILLE		1,2,3,4,5,6,8,10,12,15,16,18,19,20,21,22
PLRGKYMA	PLEASANT RIDGE	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
PMBRKYMA	PEMBROKE		1,2,3,4,6,8,10,12,16,18,19,20,21,22
PNTHKYMA	PANTHER		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
PNVLKYMA	PAINTSVILLE	1	1,2,3,4,5,6,8,10,12,15,16,18,19,20,21,22
PRBGKYES	PRESTONSBURG		1,2,3,4,5,6,8,10,12,15,16,18,19,20,21,22
PRTNKYES	PRINCETON	3	1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
PRVDKYMA	PROVIDENCE	1	1,2,3,4,8,10,12,16,17,18,19,20,21,22
PRVLKYMA	PERRYVILLE	5	1,2,3,4,6,8,10,12,16,18,19,20,21,22
PTRYKYMA	PORT ROYAL	1	1,2,3,4,6,8,10,12,16,18,19,20,21,22
RBRDKYMA	ROBARDS		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
RCMDKYMA	RICHMOND	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
RLVLKYMA	RUSSELLVILLE	2	1,2,3,4,6,8,12,15,16,18,19,20,21,22
RSTRKYES	ROSE TERRACE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
SCRMKYMA	SACRAMENTO		1,2,3,4,6,8,10,12,16,18,19,20,21,22
SDVLKYMA	SADIEVILLE	1	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
SEBRKYMA	SEBREE		1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22
SHGVKYMA	SHARON GROVE	2	1,2,3,4,6,8,10,12,16,18,19,20,21,22
SHVLKYMA	SHELBYVILLE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
SLGHKYMA	SLAUGHTERS	1	1,2,3,4,6,8,10,12,15,16,17,18,19,20,21,22

* AT&T's Lifeline customer counts are as of the end of June 2021.

** The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit.

EXHIBIT A**AT&T Kentucky Lifeline Customers
CETCs Designated in AT&T Kentucky's Service Area (ILEC Wire Centers)**

Wire Center CLLI	Exchange	No. of AT&T Lifeline Customers*	Other Designated ETC**
SLPHKYMA	SULPHUR		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
SLVSKYMA	SALVISA		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
SNTNKYMA	STANTON	4	1,2,3,4,5,6,8,10,12,16,18,19,20,21,22
SPFDKYMA	MACKVILLE		1,2,3,4,6,8,12,15,16,18,19,20,21,22
SPFDKYMA	MOORESVILLE	1	1,2,3,4,6,8,12,15,16,18,19,20,21,22
SPFDKYMA	SPRINGFIELD	1	1,2,3,4,6,8,12,15,16,18,19,20,21,22
SRGHKYMA	SORGHO		1,2,3,4,6,8,12,15,16,18,19,20,21,22
SSVLKYMA	SIMPSONVILLE		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
STCHKYMA	SAINT CHARLES		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
STFRKYMA	STANFORD	1	1,2,3,4,6,8,10,12,16,18,19,20,21,22
STGRKYMA	STAMPING GROUND		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
STNLKYMA	STANLEY		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
STONKYMA	STONE		1,2,3,4,5,8,10,12,16,18,19,20,21,22
STRGKYMA	STURGIS		1,2,3,4,8,10,12,16,17,18,19,20,21,22
SWSNKYMA	SOUTH WILLIAMSON		1,2,3,4,5,8,10,12,16,18,19,20,21,22
TPVLTNMA	BESSIE BEND		1,2,3,4,8,10,12,16,18,19,20,21,22
TRE NKYMA	TRENTON		1,2,3,4,6,8,10,12,16,18,19,20,21,22
TYVLKYMA	TAYLORSVILLE	2	1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
UNCYTNMA	JORDAN		1,2,3,4,8,10,12,16,17,18,19,20,21,22
UTICKYMA	UTICA		1,2,3,4,6,8,10,12,16,18,19,20,21,22
VIRGKYMA	VIRGIE		1,2,3,4,5,6,8,10,12,16,18,19,20,21,22
WACOKYMA	WACO		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
WDDYKYMA	WADDY		1,2,3,4,6,8,10,12,15,16,18,19,20,21,22
WHBGKYMA	WHITESBURG	5	1,2,3,4,5,8,10,12,16,18,19,20,21,22
WHVLKYMA	WHITESVILLE	1	1,2,3,4,6,8,10,12,16,18,19,20,21,22
WLBGKYMA	WILLIAMSBURG	2	1,2,3,4,5,6,8,10,12,15,16,18,19,20,21,22
WLCKKYES	WALLINS CREEK	2	1,2,3,4,5,8,10,12,16,18,19,20,21,22
WLVLKYMA	WEST LOUISVILLE	1	1,2,3,4,6,8,12,15,16,18,19,20,21,22
WNCHKYMA	WINCHESTER	2	1,2,3,4,6,8,12,15,16,18,19,20,21,22
WNCHKYPV	WINCHESTER	1	1,2,3,4,6,8,12,15,16,18,19,20,21,22
WRFDKYMA	WARFIELD		1,2,3,4,5,8,10,12,16,18,19,20,21,22
WSBGKYMA	WILLISBURG		1,2,3,4,6,8,10,12,16,18,19,20,21,22
WSPNKYMA	WEST POINT		1,2,3,4,6,8,12,15,16,18,19,20,21,22
WYLDKYES	WAYLAND		1,2,3,4,5,8,10,12,15,16,18,19,20,21,22
Totals		131	

* AT&T's Lifeline customer counts are as of the end of June 2021.

** The numbers in this column correspond to the competitive eligible telecommunications carriers (CETCs) identified on the last page of this Exhibit.

EXHIBIT A

AT&T Kentucky Lifeline Customers CETCs Designated in AT&T Kentucky's Service Area (ILEC Wire Centers)

ID Code	CETC Name
1	I-WIRELESS, LLC (ACCESS WIRELESS)
2	AIRVOICE WIRELESS LLC
3	AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY
4	AMERIMEX COMMUNICATIONS CORP (AMERIMEX SOLUTIONS)
5	EAST KENTUCKY NETWORK, LLC (APPALACHIAN WIRELESS)
6	VIRGIN MOBILE USA LP (ASSURANCE WIRELESS)
8	BLUE JAY WIRELESS LLC
10	DIALOG TELECOMMUNICATION INC.
12	BOOMERANG, LLC (ENTOUCH WIRELESS)
13	E-TEL, LLC
14	PEOPLES TELECOM LLC
15	Q LINK WIRELESS LLC
16	TRACFONE WIRELESS, INC. (SAFELINK WIRELESS)
17	SAGE
18	GLOBAL CONNECTION INC OF AMERICAN (STAND UP WIRELESS)
19	TAG WIRELESS
20	TELRITE CORPORATION
21	TEMPO TELECOM LLC
22	T-MOBILE CENTRAL LLC AND POWERTEL/MEMPHIS, INC. (T-MOBILE)

EXHIBIT B

Relinquishment Notice

[Only used if Federal Communications Commission changes its rules so federal Lifeline voice discount continues past December 1, 2021]

Your Lifeline discount ends February 15, 2022

«FIRSTNAME» «LASTNAME»
«BILLINGADDRESS1» «BILLINGADDRESS2»
«BILLINGAPARTMENTNUMBER»
«BILLINGCITY», «BILLINGSTATE» «BILLINGZIP5»
«BILLINGZIP4»

Phone number ending in: <<XXXX>>

Hi «FIRSTNAME»,

AT&T will no longer provide you with a Lifeline discount in Kentucky* as of February 15, 2022.

Your options:

- Keep your AT&T home phone service, billed at regular price, with all applicable taxes, surcharges, and fees. Or, choose from any of our other plans. Call us at 855.301.0355, and we'll be happy to help.
- Contact another company that provides service in your area to see if they offer a Lifeline discount. You can contact the Universal Service Administrative Company (USAC) at **800.234.9473** or go to www.lifelinesupport.org and select **Companies Near Me** for a list of companies in your area.
- Here is a list of providers that may offer service and a Lifeline discount in your area.

[Insert list of other voice Lifeline providers here]

Thanks for choosing us,

AT&T

- * If you have received a notice to recertify your eligibility to continue receiving a Lifeline discount from AT&T, or if you receive such notice in the future, please disregard it as AT&T will no longer provide a Lifeline discount in your area.

Bill Message

News about your Lifeline service

Starting February 15, 2022, we may no longer provide a voice Lifeline discount in your area in Kentucky. If you're affected by this change, you still have options. You can keep your current plan without the Lifeline discount. You'll pay the regular price and any applicable taxes, surcharges, and fees. Or you can choose from our other plans. Call us at 855.301.0355, and we'll be happy to help. You can contact the Universal Service Administrative Company (USAC) at **800.234.9473** or go to www.lifelinesupport.org and select **Companies Near Me** for a list of companies in your area that may continue to offer a voice Lifeline discount.

EXHIBIT C

Commonwealth of Kentucky
Michael G. Adams, Secretary of State

Michael G. Adams
Secretary of State
P. O. Box 718
Frankfort, KY 40602-0718
(502) 564-3490
<http://www.sos.ky.gov>

Certificate of Authorization

Authentication number: 254961

Visit <https://web.sos.ky.gov/ftshow/certvalidate.aspx> to authenticate this certificate.

I, Michael G. Adams, Secretary of State of the Commonwealth of Kentucky, do hereby certify that according to the records in the Office of the Secretary of State,

BELLSOUTH TELECOMMUNICATIONS, LLC

, a limited liability company authorized under the laws of the state of Georgia, is authorized to transact business in the Commonwealth of Kentucky, and received the authority to transact business in Kentucky on November 11, 1991.

I further certify that all fees and penalties owed to the Secretary of State have been paid; that an application for certificate of withdrawal has not been filed; and that the most recent annual report required by KRS 14A.6-010 has been delivered to the Secretary of State.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my Official Seal at Frankfort, Kentucky, this 22nd day of September, 2021, in the 230th year of the Commonwealth.



Michael G. Adams

Michael G. Adams
Secretary of State
Commonwealth of Kentucky
254961/0292916