

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:	)	
	)	
ELECTRONIC APPLICATION OF AMERICAN	)	CASE NO.
BROADBAND AND TELECOMMUNICATIONS	)	2021-00392
COMPANY TO AMEND ITS DESIGNATION	)	
AS AN ELIGIBLE TELECOMMUNICATIONS	)	
CARRIER TO RECEIVE KENTUCKY	)	
UNIVERSAL SERVICE FUND SUPPORT	)	
FOR LIFELINE SERVICE	)	

**AMERICAN BROADBAND AND TELECOMMUNICATIONS COMPANY’S  
PETITION TO AMEND ITS DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER TO RECEIVE KENTUCKY  
UNIVERSAL SERVICE SUPPORT FOR LIFELINE SERVICE**

American Broadband and Telecommunications Company (American Broadband or Company), by its attorneys, hereby requests that the Commission amend the Company’s designation as an Eligible Telecommunications Carrier (ETC) to include authorization to receive Kentucky Universal Fund (KUSF) support for Lifeline service within the Commonwealth of Kentucky.

In an Order dated November 5, 2013, the Commission granted American Broadband’s application for designation as an ETC for the limited purpose of receiving federal Universal Service Fund (USF) support for Lifeline service.<sup>1</sup> American Broadband’s designation as an ETC was conditioned on its compliance with: (1) representations made in its ETC application; (2) representations made in a Lifeline compliance plan filed with and approved by the Federal Communications Commission (FCC); and (3) FCC rules governing the Lifeline program.<sup>2</sup>

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<sup>1</sup> See *Application of American Broadband and Telecommunications Company for Limited Designation as an Eligible Wireless Telecommunications Carrier*, Order, Case No. 2013-00175 (November 5, 2013) (American Broadband ETC Order). Based on guidance from Commission Staff, American Broadband is filing this Petition in a new docket.

<sup>2</sup> See American Broadband ETC Order, at 13.

American Broadband has been providing wireless Lifeline service to qualified low-income Kentucky residents for over seven years. Throughout that time period, American Broadband has complied with the conditions set forth in the American Broadband ETC Order, including compliance with subsequent amendments to the FCC's rules governing the Lifeline program.

By this Petition, American Broadband requests Commission authorization to receive KUSF support to reimburse it for providing discounted Lifeline services to low-income Kentucky consumers. There is no legal prohibition on wireless carriers being eligible to receive KUSF support for Lifeline service, and the Commission has approved several wireless Lifeline providers to receive KUSF support.<sup>3</sup> Furthermore, American Broadband is not required to meet any additional requirements, beyond the requirements for designation as an ETC for receipt of federal USF support, to qualify for receipt of KUSF support. Given that the Commission has already determined that American Broadband is qualified to receive federal USF support, the Commission does not need to engage in any fact-finding prior to authorizing American Broadband to receive KUSF support.

Finally, grant of American Broadband's petition will serve the public interest by allowing American Broadband to offer enhanced Lifeline service to qualifying low-income Kentucky residents. American Broadband's standard Lifeline service offering in states in which it does not receive state USF support is 500 voice minutes, unlimited text messages, and 4.5 GB of data each month for a co-pay of \$14.95. In Kentucky, American Broadband will use the additional

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<sup>3</sup> See *Electronic Petition of TracFone Wireless, Inc. to Amend Its Designation as an Eligible Telecommunications Carrier to Receive Universal Service Support for Lifeline Service*, Order, Case No. 2019-00185 (Jan. 28, 2020), at 3; see also *Petition of i-wireless, LLC for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky for the Limited Purpose of Offering Lifeline Service to Qualified Households*, Order, Case No. 2010-00478 (Nov. 23, 2010).

\$6.00 in KUSF support to increase the voice minutes component of its Lifeline service plan to unlimited voice minutes. The availability of unlimited voice minutes will allow Lifeline subscribers to have the ability to conduct business, communicate with employers, health care providers, and government services, and stay in contact with family members without any concern about running out of voice minutes. Moreover, low-income Kentucky residents will benefit from increased competition within the Lifeline service market. Increased competition leads to additional consumer choices and delivery of greater value to consumers.

### **CONCLUSION**

Based on the foregoing, American Broadband requests that the Commission promptly grant its Petition to amend its designation as an ETC to include approval to receive Kentucky USF support for Lifeline service provided to low-income Lifeline-eligible Kentucky households.

Respectfully submitted,

**AMERICAN BROADBAND AND  
TELECOMMUNICATIONS COMPANY**

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