



December 10, 2024

VIA U.S. POSTAL SERVICE

Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40601

RE: Lifeline ETC Designation Request

To Whom It May Concern,

On behalf of West Kentucky Rural Telephone Cooperative Corporation, Inc. ("WK&T"), enclosed please find WK&T's request for the Kentucky Public Service Commission to designate it as a Lifeline-only Eligible Telecommunications Carrier ("ETC") in Kentucky where WK&T serves as an incumbent local exchange carrier. Should you have any questions regarding this submission, please contact me.

Sincerely,

Jackie McCarthy

Authorized Representative of
WK&T

Attachments

**Before the
KENTUCKY PUBLIC SERVICE COMMISSION**

In the Matter of)	
West Kentucky Rural Telephone)	
Cooperative Corporation, Inc.)	Case No. _____
)	
Application for Designation as an)	
Eligible Telecommunications Carrier)	
for Lifeline Support)	

**WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORATION,
INC.'S APPLICATION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER FOR LIFELINE SUPPORT**

Pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), and Sections 54.201 and 54.202 of the rules of the Federal Communications Commission (“FCC”)¹, West Kentucky Rural Telephone Cooperative Corporation, Inc. (“WK&T”), respectfully requests designation from the Kentucky Public Service Commission (the “Commission”) as a Lifeline-only Eligible Telecommunications Carrier (“ETC”) in Kentucky where WK&T serves as an incumbent local exchange carrier (“ILEC”). The Commission previously designated WK&T as a High-Cost ETC in census blocks throughout WK&T’s CLEC territory where WK&T has been allocated Rural Digital Opportunity Fund (“RDOF”) Phase I support through the FCC’s RDOF Phase I Auction (“Auction 904”) (the “RDOF Auction”).² WK&T respectfully requests designation as a Lifeline-only ETC throughout the rest of its CLEC territory, identified in **Exhibit B**.

WK&T meets state and federal requirements for ETC designation, as well as federal statutory and regulatory requirements for Lifeline-only ETC designation. The Commission has the authority to grant Lifeline-only ETC designation to WK&T pursuant to relevant state law, as discussed herein. Designating WK&T as a Lifeline-only ETC in the proposed service

¹ See 47 U.S.C. § 214(e)(6); 47 C.F.R. §§ 54.201 & 54.803(b).

² See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidder Announced; FCC Form 683 Due January 29, 2021, Public Notice, DA 20-1422, (rel. Dec. 7, 2020) (“Auction 904 Results Notice”).

area will serve the public interest and advance the goals of universal service by enabling WK&T to provide subsidized broadband and voice services to qualifying low-income consumers.

I. BACKGROUND

WK&T is a Kentucky cooperative headquartered at 100 WK&T Technology Drive, Mayfield, Kentucky 42066. WK&T is currently authorized to transact business in the Commonwealth of Kentucky and the State of Tennessee. WK&T was established in 1951 as a not-for-profit, member-owned cooperative to provide local telephone service to business and residential members within the Kentucky exchanges of Cunningham, Fairdealing, Fancy Farm, Farmington, Folsomdale, Hardin, Hazel, Kirksey, Lowes, Lynn Grove, Lynnville, New Concord, Sedalia, West Plains, and Wingo, in addition to the Tennessee exchanges of Cottage Grove, Cypress, Puryear, and South Hazel (“Service Territory”). WK&T is also an ILEC serving parts of Calloway, Carlisle, Graves, McCracken, Marshall, and Hickman counties in western Kentucky. WK&T is also a carrier of last resort (“COLR”) in its Service Territory. Today, WK&T serves approximately 5,621 customers with voice service and approximately 14,825 customers with broadband service in Kentucky, as well as approximately 2,498 customers with voice service and 7,549 customers with broadband service in Tennessee.

II. COMMUNICATIONS AND CORRESPONDENCE

Pleadings, orders, notices, or other correspondence and communications regarding this Petition should be provided to:

Karen Jackson-Furman
COO
West Kentucky Rural Telephone Cooperative Corporation, Inc.
100 WK&T Technology Dr., Mayfield, KY 42066
270-856-9988
kfurman@mywkt.coop

With a copy to:

Melvin J. Malone
Attorney

Butler Snow LLP
150 3rd Avenue South, Suite 1600
Nashville, TN 37201
615-651-6705
Melvin.Malone@butlersnow.com

III. THE COMMISSION HAS JURISDICTION OVER WK&T'S ETC DESIGNATION REQUEST

Pursuant to Kentucky Revised Statutes Section 278.542(1)(i), the Commission has jurisdiction over the Lifeline Services Program. Therefore, WK&T seeks Lifeline ETC designation from the Commission.

IV. WK&T SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC

As demonstrated herein, WK&T satisfies each of the state and federal statutory and regulatory requirements to be an ETC.

A. WK&T Will Provide Service as a Common Carrier.

WK&T will provide service on a common carrier basis. WK&T is a common carrier by virtue of its provision of interconnected VoIP service on a common carrier basis. WK&T certifies it is a common carrier under Sections 214(e)(1) and 214(e)(6) of the Act.³

B. WK&T Will Offer the Services Supported by Federal Universal Service Support Mechanisms.

WK&T certifies that it will provide the following services that are supported by federal universal service support mechanisms⁴:

(1) *Voice Grade Access to the Public Switched Telephone Network*

WK&T meets this requirement through its provision of VoIP service that includes minutes of use for local service provided at no charge to end users (*i.e.*, plans generally offer unlimited usage within the U.S.) and access to emergency services via 911 or E-911, wherever available from local government or public safety organizations.⁵ WK&T's

³ See Affidavit of Karen Furman-Jackson, Chief Operating Officer of WK&T, attached as Exhibit A.

⁴ See 47 U.S.C. § 214(e)(6).

⁵ See 47 C.F.R. § 54.101(a)(1) and (b).

interconnected VoIP service satisfies the FCC's definition of voice telephony service. WK&T will offer stand-alone voice telephony service throughout its proposed ETC designation area and such service at rates reasonably comparable to urban rates.¹² With respect to toll limitation services to qualifying low-income consumers as provided in Sections 54.400 and 54.423 of the Commission's rules⁶, there is no requirement to provide toll limitation services if the Lifeline offering provides a set number of minutes that do not distinguish between toll and non-toll calls.⁷ WK&T's VoIP service offering does not distinguish between toll and non-toll calls. Thus, WK&T is not required to provide toll limitation services and currently has no plans to offer such services.

(2) *Broadband Internet Access Services*

WK&T's broadband Internet offering will provide the capability to transmit data to and receive data by wire and radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service. WK&T will offer low-latency Internet service at the speeds and prices reflected herein, with no data caps, no contracts, and no equipment fees. WK&T's provision of high-speed broadband Internet over its fiber-based facilities satisfies the FCC's definition of broadband Internet access, and thus WK&T will provide all services designated for support by the FCC. WK&T will provide these services consistent with the Commission's Lifeline rules and offer such services at rates that are reasonably comparable to urban rates.

(3) *Lifeline Discounts for Qualifying Low-Income Consumers*

WK&T will offer subsidized Lifeline voice and broadband services, including a standalone voice service offering, to qualifying low-income consumers, consistent with the Commission's rules, within its proposed ETC designation area.⁸ WK&T will offer the applicable monthly Lifeline discount on any voice and broadband plans that it offers to its non-Lifeline subscribers, identified herein. WK&T will meet or exceed the minimum service

⁶ See *USF/ICC Transformation Order*, Order, 26 FCC Rcd at 17693, paras. 80-81; see also 47 C.F.R. § 54.101(b).

⁷ See 47 C.F.R. § 54.401(a)(2).

⁸ See 47 C.F.R. §§ 54.405(a), 54.400 et. seq.

standards for Lifeline- supported services, subject to any applicable exceptions for providers of fixed broadband services.⁹

C. WK&T Will Provide Service Using a Combination of its Own Facilities and Services of a Third-Party VoIP Provider.

WK&T provides voice and broadband services using a combination of its own facilities and resale of another carrier's services. WK&T is a facilities-based broadband Internet access and VoIP service provider. WK&T offers voice and broadband services over facilities wholly owned by WK&T. In some areas, WK&T provides voice-grade services by reselling a third-party's VoIP service. WK&T will thus offer the supported services using its own facilities or a combination of its own facilities and resale of another carrier's services.¹⁰ In accordance with 47 U.S.C. § 254(e), WK&T will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

D. WK&T Will Provide the Supported Services Throughout the Proposed ETC Designation Service Area.

WK&T commits to providing the supported services throughout the designated service area for which it seeks ETC designation, consistent with all applicable requirements.¹¹

E. WK&T Will Advertise the Availability of the Supported Services and the Relevant Charges Using Media of General Distribution.

WK&T will advertise the availability of, and charges for, its supported service offerings using media of general distribution and undertake outreach initiatives to increase consumer awareness of WK&T's service offerings, consistent with all applicable requirements.¹² WK&T will advertise through a combination of digital and traditional media, such as the Internet; outbound Email; advertising via radio, newspapers, magazines, or other print advertisements;

⁹ See 47 C.F.R. § 54.408(b); 47 C.F.R. § 54.408(d).

¹⁰ See 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1).

¹¹ See 47 C.F.R. § 54.101; 47 C.F.R. § 54.201.

¹² See 47 C.F.R. § 54.201(d)(2).

outdoor advertising; or direct marketing, and will also publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

F. WK&T Has the Ability to Remain Functional in Emergency Situations.

WK&T can function in emergency situations as set forth in Section 54.202(a)(2) of the FCC's rules.¹³ WK&T has established reasonable provisions to meet emergencies resulting from failures of power service, sudden and prolonged increases in traffic, illness of operators, or other credible emergency situations. These plans include provisions to supply a reasonable amount of emergency power and contain activation, required staffing, escalation, and communication procedures to deal with such emergencies. WK&T's fiber availability is designed to remain functional in emergency situations without an external power source, reroute traffic around damaged facilities, and manage traffic spikes resulting from emergency situations as required by Section 54.202(a)(2) of the FCC's rules.¹⁴ WK&T also has access to redundant uplink providers and access to generators, portable generators and backup battery that will be able to operate remotes in the event of a prolonged power outage. WK&T is capable of managing traffic spikes resulting from emergency situations since it has access to adequate backhaul bandwidth to handle spikes that arise in emergency situations. Finally, WK&T can change call routing translations as needed to reroute traffic around damaged facilities.

V. WK&T MEETS THE ADDITIONAL FEDERAL STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS A LIFELINE-ONLY ETC IN THE PROPOSED SERVICE AREA

WK&T meets the FCC's requirements for designation as a Lifeline-only ETC in the proposed service area under § 214(e)(1) of the Act.¹⁵ WK&T has applied for FCC approval of its Lifeline service offerings in Tennessee, as Tennessee does not exercise jurisdiction over Lifeline ETC designations in the state.

¹³ See 47 C.F.R. § 54.202(a)(2) (requiring ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities and is capable of maintaining traffic spikes resulting from emergency situations.")

¹⁴ See *id.*

¹⁵ See 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.202(a)

A. Compliance with Applicable Service and Performance Quality Requirements

Applicable to Lifeline Support.

WK&T will comply with all applicable requirements related to receipt of low-income support, consistent with the Lifeline support program.¹⁶ Given that WK&T seeks designation as an ETC for Lifeline support only, a five-year network improvement plan is not provided.¹⁷

B. Compliance with Consumer Protection and Service Quality Standards.

WK&T is subject to and complies with all state and federal consumer protection requirements and service quality standards applicable to its operations. WK&T has not been the subject of any serious consumer complaints or investigations. WK&T will continue to prioritize complying with all applicable consumer protection and service quality standards to satisfy this requirement.¹⁸

C. WK&T is Financially and Technically Capable of Providing the Supported Services.

A common carrier seeking ETC designation for Lifeline support must demonstrate that it is financially and technically capable of providing Lifeline service in compliance with the Commission's rules.¹⁹ The Commission will consider whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund ("USF") disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.²⁰

With USF support, WK&T will offer high-speed broadband Internet and VoIP services to both Lifeline and non-Lifeline consumers in the proposed designated service area and is

¹⁶ See 47 C.F.R. § 54.202(a)(1)(i).

¹⁷ See 47 C.F.R. § 54.202(a)(1)(ii).

¹⁸ See 47 C.F.R. § 54.202(a)(3).

¹⁹ See 47 C.F.R. § 54.202(a)(4).

²⁰ See Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking, 77 Fed. Reg. 12,952 (Mar. 2, 2012) para. 388.

financially capable of operating. WK&T has been operating as a voice and broadband provider throughout the proposed service area since 1951. WK&T does not, and will not, rely on universal service fund disbursements to operate - the majority of WK&T's funds to operate will come from "non-Lifeline" services it provides throughout its service territory. Finally, WK&T has not been subject to any enforcement proceedings or ETC revocation proceedings.

With respect to its supported Lifeline service offerings, WK&T will offer high-speed broadband Internet services and resell VoIP services purchased from a third-party. WK&T will repackage the VoIP services purchased and offer the services over WK&T's own fiber network. SCTC's partnership with a third-party VoIP provider demonstrates that WK&T is technically capable of providing supported Lifeline service. WK&T has experience building, maintaining, and upgrading telecommunications and broadband infrastructure. WK&T can manage, build, maintain and repair infrastructure for support of the proposed telecommunications and broadband services. WK&T has trained technicians and equipment dedicated to repairing and restoration activities. WK&T has a 24-hour call service to report emergencies. WK&T technicians can be dispatched 24/7 if necessary. Member service representatives are available during normal business hours. WK&T has qualified employees to support the proposed telecommunications and broadband services.

D. Terms and Conditions of Voice Telephony Service Plans Offered to Lifeline

Subscribers. ³⁰

WK&T will offer the applicable monthly Lifeline discount on any voice plans that it offers to its non-Lifeline subscribers. WK&T offers voice services through its provision of VoIP. SCTC will resell the VoIP services of a third-party, wholesale VoIP provider and repackage the service to offer VoIP over WK&T's own fiber-based facilities. WK&T will offer customers voice grade access to the Public Switched Telephone Network ("PSTN") through its VoIP services at a standalone rate of \$39.90. WK&T's VoIP service will include the following features and capabilities: unlimited long distance, caller-ID, call waiting, E911, call return, robocall blocking, personalized user portal, call detail records via the portal, call forwarding (with failover), caller ID blocking, simultaneous ring, three-way calling, voicemail, missed call alert via email and hunting/rollover calls.

E. Terms and Conditions of Broadband Internet Access Service Plans Offered to Lifeline Subscribers.

WK&T will offer the applicable monthly Lifeline discount on any broadband plans that it offers to its non-Lifeline subscribers. WK&T will have fiber availability over which to offer and provide broadband and VoIP services to customers throughout the proposed ETC designation service area, which has largely lacked access to such services. WK&T offers broadband service at the following speeds and prices with no data caps, no contracts, and no equipment fees³²:

Speed	Price Per Month
300 Mbps/300 Mbps	\$59.90
1000 Mbps/1000 Mbps	\$89.90
2000 Mbps/2000 Mbps	\$149.90

VI. WK&T WILL COMPLY WITH SERVICE REQUIREMENTS APPLICABLE TO LIFELINE SERVICES.

WK&T commits to offering Lifeline discounts to qualifying low-income consumers, consistent with the Commission's rules in the requested service area.

A. Service Plans

WK&T will offer voice and broadband Lifeline service consistent with the rules of the FCC, including the minimum service standards for Lifeline service outlined in Sections 54.408(b)(1) and (c) of the Commission's rules.²¹ WK&T will offer the applicable monthly Lifeline discount on any voice and broadband plans that it offers to its non-Lifeline subscribers.

B. Verification Requirements

WK&T will comply with the applicable subscriber eligibility determination and certification requirements outlined in Section 54.410 of the FCC's rules, as recently modified by the FCC in its *Lifeline Reform Order*, through its use of the National Verifier, which was launched in Kentucky in 2018. WK&T will provide Lifeline service only to customers whose eligibility is confirmed via the National Verifier. Customers wishing to apply for federal Lifeline benefits will be instructed to apply to the National Verifier either by applying online or via U.S. Mail.

C. Lifeline Obligations

1. WK&T will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

²¹ See 47 C.F.R. § 54.410; *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, 31 FCC Rcd 3962, 4006, para. 126 (2016) (*Lifeline Reform Order*)

2. WK&T will indicate on all materials describing the Lifeline service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, the service is non-transferable, only eligible customers may enroll in the program, and the program is limited to one discount per household.²²

3. WK&T will disclose its name on all materials describing the service.²³

4. WK&T will de-enroll Lifeline subscribers when it has a reasonable basis to believe that the Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer in compliance with Section 54.409 of the FCC's Rules.²⁴

D. Minimum Service Standards

WK&T will meet the minimum service standards for Lifeline service, as set forth in Sections 54.408(b)(1) and (c) of the FCC's rules.²⁵

E. Annual Certifications

WK&T will comply with the annual certification requirements set forth in Section 54.416 of the FCC's rules, including the requirement to provide, on an annual basis, the results of its re-certification efforts to the Commission.

F. Recordkeeping Requirements

WK&T will comply with applicable recordkeeping requirements, as set forth in Section 54.417 of the Commission's Rules.

G. Annual Reporting Requirements

²² See 47 C.F.R. § 54.405(c).

²³ See 47 C.F.R. § 54.405(d).

²⁴ See 47 C.F.R. § 54.405(e).

²⁵ See 47 C.F.R. § 54.408(b)-(c).

WK&T will comply with applicable annual reporting requirements, as set forth in Section 54.422 of the Commission's Rules, including the requirement to file such reports with the Commission.

VII. DESIGNATION OF WK&T AS AN ETC IS IN THE PUBLIC INTEREST

The designation of WK&T as an ETC for Lifeline support will serve the public interest by allowing WK&T to offer discounted voice and broadband services to low-income households that qualify for Lifeline benefits. As a Lifeline-only ETC, WK&T will bring affordable high-speed broadband Internet and VoIP services to underserved locations in the proposed designated service area. Grant of this Petition will serve the public interest by enabling WK&T to provide subsidized low-latency, gigabit-speed broadband, and interconnected VoIP-based voice services to households seeking and qualifying for federal Lifeline benefits. WK&T's Lifeline-only ETC designation will bring another competitive voice and broadband provider to low-income consumers in the proposed service area. WK&T is committed to making it easier for low-income customers within the proposed service area to receive affordable telecommunications and high-speed broadband Internet services comparable to those other customers enjoy. WK&T's participation will "encourage the deployment on a reasonable and timely basis of advanced telecommunications capability and aid the Commission's objective of ensuring that federal universal service support is used efficiently and effectively.

WK&T understands that access to affordable voice services and high-speed broadband will create better healthcare, education, and job opportunities, improving residents' quality of life and attracting more residents. WK&T's Lifeline-only ETC designation will bring expanded

voice and broadband connectivity to rural areas in Kentucky, helping to close the digital divide for those residents and create further economic opportunities for communities that will benefit from increased connectivity. WK&T's designation as a Lifeline-only ETC will serve the public interest by providing services to customers that may not otherwise be able to afford telecommunications and broadband services. Lifeline supported services also offer customers convenience, control over their telecommunications and high-speed broadband Internet spending without high monthly fees, and the ability to pay for only those services needed. The goals of universal service mandated by Congress, the FCC and the Commission would be served by designating WK&T as a Lifeline-only ETC. Designating WK&T as a Lifeline-only ETC in the proposed service area is in the public interest.

Furthermore, any Lifeline support that WK&T receives will have a *de minimis* impact on the fund, which the FCC has determined would be outweighed by the benefit of increasing participation in the Lifeline program. Finally, all providers must contribute a portion of their interstate revenues to the Universal Service Fund. In accordance with federal regulations, WK&T will contribute to the Universal Service Fund based upon the portion of its revenues determined to be interstate. Thus, approving WK&T as a Lifeline-only ETC will create contributions to the Universal Service Fund that were previously nonexistent.

VIII. ANTI-DRUG ABUSE CERTIFICATION

WK&T certifies that neither the petitioner nor any party to the petition is subject to a denial of Federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

IX. CONCLUSION

For the reasons stated herein, WK&T respectfully requests (i) an expeditious Order designating it as a Lifeline-only ETC throughout the proposed service areas in Kentucky so that WK&T will be eligible to provide Lifeline subsidies to those within its proposed ETC designation area who are qualified to receive Lifeline benefits; and (ii) such other relief as this Commission deems to be just and equitable.

Respectfully submitted,

/s/ Karen Jackson-Furman
Karen Jackson-Furman, COO
West Kentucky Rural Telephone Cooperative
100 WK&T Technology Dr.
Mayfield, KY 42066

LIST OF EXHIBITS

Exhibit A – Affidavit

Exhibit B – Map of Area Where WK&T Seeks Lifeline-Only ETC Designation

EXHIBIT A

AFFIDAVIT OF WEST KENTUCKY RURAL TELEPHONE COOPERATIVE

NOW COMES Karen Jackson-Furman, upon oath, being duly sworn, and states as follows:

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 Chief Operating Officer of West Kentucky Rural Telephone Cooperative (“WK&T”). I have read the Petition to which this Affidavit is attached. 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. WK&T certifies that it is a common carrier under §§214(e)(1) and (6) of the Communications Act of 1934, as amended (“Act”).

4. WK&T commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier (“ETC”) in the census blocks described in the Application.

5. WK&T certifies that it will meet all of the Commission’s requirements for designation as an ETC under §214(e)(6) of the Act.

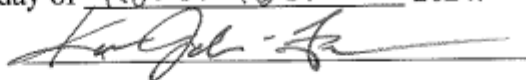
6. I am the corporate officer that will be responsible for certifying WK&T’s use of federal high-cost support.

7. WK&T is eligible to be designated as an ETC within the meaning of Section 214(e) of the Act and is eligible to receive federal universal service support pursuant to Section 254(e) of the Act.

8. WK&T will use the RDOF funds it receives only to provide, construct, upgrade, and maintain facilities and services for which the support is intended.

9. WK&T certifies that no party to this Application is subject to denial of federal benefits, including Commission benefits, pursuant to § 5301 of the Anti-Drug Abuse Act of 1988.

Dated at Mayfield, KY, this 26 day of NOVEMBER 2024.

A handwritten signature in cursive script, appearing to read "Karen Jackson-Furman", written over a horizontal line.

Karen, Jackson-Furman

Chief Operating Officer

COMMONWEALTH OF Kentucky

COUNTY OF Graves, ss.

At Mayfield, County of Graves, Commonwealth of Kentucky, this 26 day of November 2024, the above-named Karen Jackson-Furman personally appeared before me and subscribed and swore to the foregoing instrument as representing his free act and deed.



Paige Stallings

Notary Public/Justice of the Peace

My Commission Expires: 3/14/26

EXHIBIT B

**Map of Service Area For Which WK&T Seeks ETC Designation for Lifeline-Only
Support**

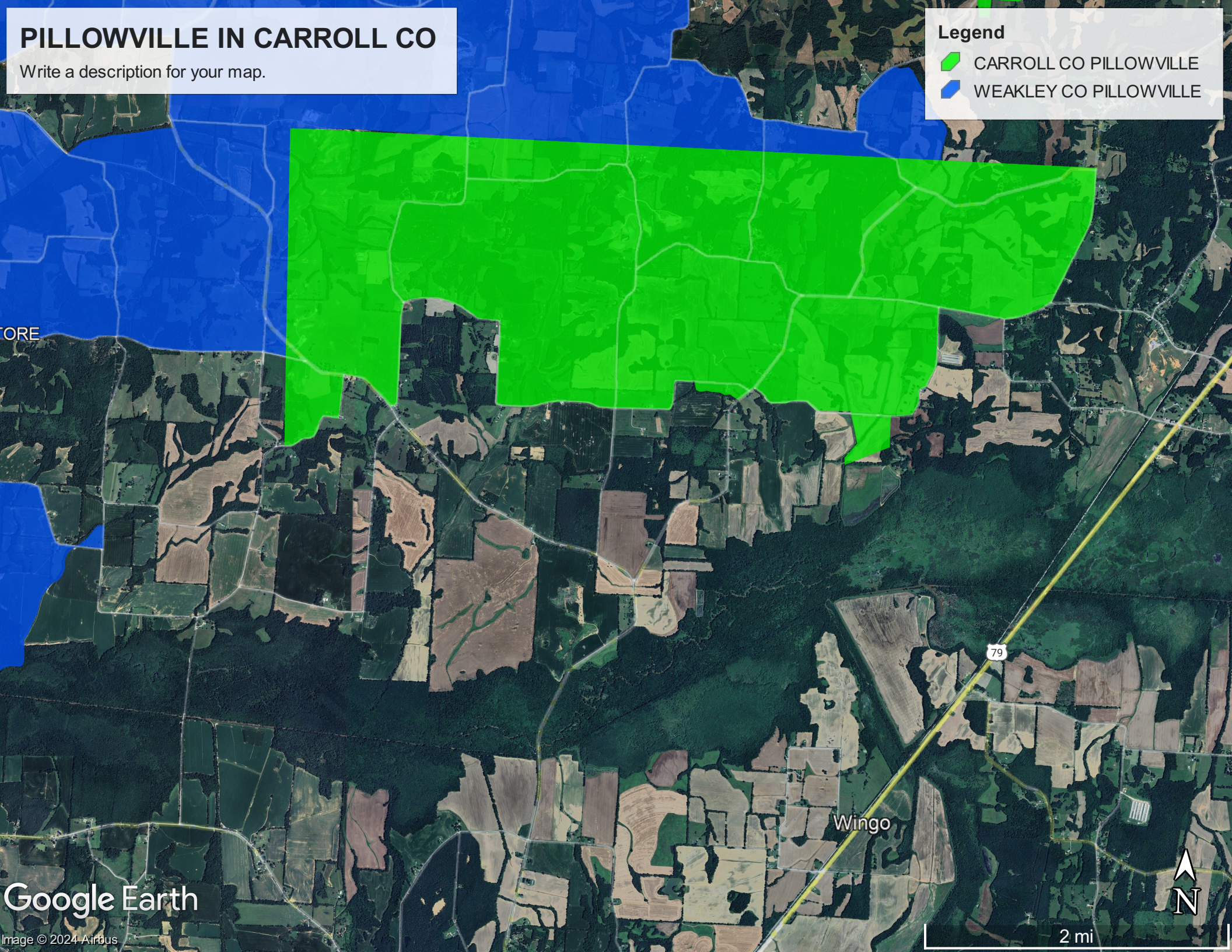
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