

**BEFORE THE PUBLIC SERVICE COMMISSION
OF
THE STATE OF MISSISSIPPI**

PEARL RIVER VALLEY
COMMUNICATIONS, LLC

DOCKET NO. 2021-UA-014

RE: APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER TO RECEIVE RURAL DIGITAL OPPORTUNITY FUND PHASE I AUCTION (AUCTION 904) SUPPORT FOR VOICE AND BROADBAND SERVICES

RECOMMENDED ORDER

On January 6, 2021, Pearl River Valley Communications, LLC (“PRVC” or “Company”) filed with the Mississippi Public Service Commission (“Commission”), an application for designation as an Eligible Telecommunications Carrier (“ETC”), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), and in accordance with other applicable rules and orders of the Commission,¹ seeking ETC designation in all areas where PRVC has been conditionally allocated Rural Digital Opportunity Fund (“RDOF”) Phase I support by the Federal Communications Commission (“FCC”), as well as Lifeline-only ETC designation status in additional areas. Please see Exhibit A attached hereto containing the application of PRVC for designation as an ETC.

¹ *In the Matter of Eligible Telecommunications Carrier Designation for Federal Universal Service Support*, Docket No. 2005-AD-662, Order on Rehearing Reforming and Modernizing Universal Service Support and Adopting Changes of FCC Order 11-161 (adopted Nov. 15, 2012) (“*November 2012 Order*”). An “Eligible Telecommunications Carrier (‘ETC’) Checklist, Revised to Reflect Changes of FCC 11-161” (“ETC Checklist”) is attached as Exhibit A of the *November 2012 Order*. In 2018, the Commission sought comment on amending the ETC Checklist, stating that “[a]fter receipt of comments and reply comments, the Commission will issue an appropriate Order regarding the revised checklist.” *In the Matter of ETC Designation for Federal Universal Service Support*, Docket No. 2005-AD-662, Order Amending Checklist and Updating Reporting Requirements (adopted Nov. 6, 2018).

PRVC, a limited liability company organized and existing under the laws of the State of Mississippi, is a wholly-owned subsidiary of Pearl River Valley Electric Power Association (“PRVEPA”), a not-for-profit, member-owned electric cooperative. PRVEPA provides electric service to residential, commercial, industrial, and public facilities.

PRVC is engaged in deploying a new state-of-the-art, low-latency, fiber-to-the-home (“FTTH”) network that will provide high-speed broadband and interconnected Voice over Internet Protocol (“VoIP”) enabled voice services throughout the RDOF Phase I-eligible census blocks identified in Exhibit A1 and A2 of its ETC application and seeks High-Cost and Low-Income ETC designation from the Commission to serve these census blocks. In addition, PRVC seeks Lifeline-only ETC designation status in additional areas primarily consisting of TEPA’s electric service footprint, identified in Exhibit A2 of its ETC application.

PRVC will offer low-latency broadband service at actual speeds of at least 1 gigabit per second (downlink) and 500 Mbps (uplink) and will offer at least 2 terabytes of monthly usage throughout its requested ETC designation area. In addition, PRVC will provide its customers with voice-grade access to the Public Switched Telephone Network (“PSTN”) through its provision of interconnected VoIP-enabled voice service.

The Commission, being fully apprised in the premises and having considered the record before it, as authorized by law and the Commission's Public Utilities Rules of Practice and Procedure, and upon recommendation of the Mississippi Public Utilities Staff (“Staff”), finds as follows:

1. On January 30, 2020, the FCC issued a Report and Order enabling the FCC to move forward with Auction 904, committing up to \$16 billion over 10 years to support up to gigabit

speed broadband networks in rural America wholly unserved by 25/3 Mbps.² The FCC allocated Auction 904 funding through a multi-round, reverse, descending clock auction favoring faster services with lower latency.

2. In a December 7, 2020 Public Notice, the FCC announced that the Rural Electric Cooperative Consortium (“RECC”) was a winning bidder in the RDOF Phase I auction.³ PRVC, a member of the RECC, was assigned 1,599 of the census blocks in Mississippi awarded by the RECC which includes a total of 15,356 eligible locations. As a result, PRVC is slated to receive a total of \$25,761,776.30 of RDOF Phase I support over 10 years.⁴

3. On February 2, 2021, the Commission issued an Order referring PRVC’s ETC application to Commissioner Dane Maxwell, Southern District, for hearing, report and recommendation of an appropriate Order, or any other action necessary, pursuant to Miss. Code Ann. § 77-3-40(6).

4. Staff issued its First Set of Data Requests to PRVC on January 29, 2021, and PRVC submitted its Responses to Staff on February 26, 2021.

5. PRVC’s receipt of RDOF Phase I Auction funding is conditioned upon PRVC obtaining designation as a High-Cost and Low-Income ETC in the census blocks identified in Exhibit A1 and A2 of its ETC application. By June 7, 2021, absent a waiver being granted by the FCC, PRVC must obtain ETC designation in all of the census blocks in which PRVC has been awarded RDOF Phase I support and submit appropriate documentation of such ETC designation to the FCC.

² *In the Matter of Rural Digital Opportunity Fund; Connect America Fund*, Report and Order, 35 FCC Rcd 686 (2020).

³ *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021*, Public Notice, 35 FCC Rcd 13888 (2020).

⁴ See <https://www.fcc.gov/file/20525/download>.

6. Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e)(2) shall be eligible to receive specific federal universal service support.”⁵ Section 214(e)(2) of the Act provides that state commissions “shall designate” common carriers that meet the statutory requirements as ETCs. The FCC has ruled that Section 214(e)(2) of the Act “provides state commissions with the primary responsibility for designating ETCs.”⁶

7. The Commission has stated that the FCC has “charge[d] states with the authority and obligation to certify that all federal high-cost and CAF [Connect America Fund] support is being used by carriers in a manner for which the support is intended[,]”⁷ and that “Section 77-3-35 explicitly authorizes the Commission to regulate and further the provision of universal service”⁸ Therefore, the Commission has the authority and the primary responsibility under federal law to designate PRVC as an ETC for federal universal service support purposes. The *November 2012 Order* and Section I of the ETC Checklist establish the requirements that an applicant must meet in order to be designated as an ETC.

8. To be designated as an ETC, an applicant must be a common carrier.⁹ For the customers and locations where RDOF Phase I support has been allocated, PRVC will provide its services on a common carrier basis. PRVC is a common carrier for purposes of Section 214(e) of the Act.¹⁰

⁵ 47 U.S.C. § 254(e).

⁶ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 20 FCC Rcd 6371, 6372 (¶ 1, n.2) (2005) (emphasis added) (interpreting 47 U.S.C. § 254(e)(2)).

⁷ *November 2012 Order* at 3 (¶ 8).

⁸ *Id.* at ¶ 11 (citing M.C.A. § 77-35).

⁹ 47 U.S.C. § 214(e)(1) (providing that a “common carrier” must be designated as an ETC to receive universal service support). The Act defines a “common carrier” as “any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or interstate or foreign radio transmission of energy” 47 U.S.C. § 153(11).

¹⁰ 47 U.S.C. § 214(e).

9. To be designated as an ETC, an applicant must offer throughout the area in which it proposed to be an ETC, the services set forth in Section 54.101(a) of the FCC's rules,¹¹ either by using its own facilities or a combination of its own facilities and the resale of another carrier's services. PRVC will offer, upon designation as an ETC, all of the supported services throughout the areas in which it is requesting designation as an ETC through the provision of VoIP-enabled voice communications service that is interconnected to the PSTN, as well as high-speed broadband services. The Company commits to provide these services consistent with applicable FCC rules relating to high-cost universal service support.¹²

10. PRVC will offer both 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 service via E-911, wherever available from local government or public safety organizations. If required, PRVC also commits to provide toll limitation services to qualifying low-income consumers as provided in Sections 54.400-54.423 of the FCC's rules.¹³

11. PRVC's broadband Internet offering will provide the capability to transmit data to, and receive data from, all or substantially all Internet endpoints, including any capabilities that are incidental to, and enable the operation of, communications services.¹⁴ As noted earlier, PRVC will

¹¹ 47 CFR § 54.101(a).

¹² This commitment also complies with Section I.A.1.a. of the ETC Checklist (required services).

¹³ *Id.*, §§ 54.400-54.423. PRVC's compliance and commitments with respect to the applicable federal rules also constitute compliance with Section I.A.4. of the ETC Checklist (voice telephony service). PRVC does not distinguish between toll and non-toll calls in the pricing of its services and, as a result, toll limitation services do not need to be offered for any Lifeline service offered by PRVC.

¹⁴ See 47 CFR § 54.101(a)(2) (stating that "[e]ligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service").

(1) offer low-latency Internet service at actual speeds of at least 1 Gbps (downlink) and 500 Mbps (uplink); (2) offer at least 2 terabytes of monthly usage to customers within its proposed ETC designation area; and (3) offer such service at rates that are reasonably comparable to urban rates.

12. As required by Section 54.405(a) of the FCC's rules,¹⁵ PRVC will offer subsidized Lifeline voice and broadband services, including a standalone voice service offering, to qualifying low-income consumers within its proposed ETC designation area and in accordance with the FCC's rules.¹⁶

13. PRVC will comply with the RDOF Phase I service requirements applicable to the federal universal service support that it receives,¹⁷ including the requirements for receipt of RDOF Phase I support. Specifically, PRVC, as an FCC Form 683 applicant for RDOF Phase I support,¹⁸ has:

a. certified to the FCC that it complies with all statutory and regulatory requirements for receiving the universal service support that it seeks as of the long-form application filing deadline;¹⁹

b. certified to the FCC that it is financially and technically capable of meeting the relevant public interest obligations for each performance tier and latency combination in the geographic areas in which it seeks support;²⁰

¹⁵ *Id.*, § 54.405(a).

¹⁶ *Id.*, §§ 54.400-54.423.

¹⁷ See ETC Checklist, § I.A.1.b.vi.

¹⁸ Each Auction 904 winning bidder "is required to file an application for Rural Digital Opportunity Fund support, referred to as a long-form application" *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, AU Docket No. 20-34, *et al.*, Public Notice, 35 FCC Rcd 6077, 6163 (¶ 286) (2020) ("*Auction 904 Public Notice*").

¹⁹ *Id.* at 6165 (¶ 296) (citing 47 CFR § 54.804(b)(2)(v)).

²⁰ *Id.* at 6166 (¶ 298) (citing 47 CFR § 54.804(b)(2)(ii)).

c. certified to the FCC that it will meet the relevant public interest obligations for each performance tier and latency combination for which it was deemed a winning bidder, including the requirement that it will offer service at rates that are equal to or lower than the FCC's reasonable comparability benchmarks for fixed services offered in urban areas;²¹

d. demonstrated to the FCC that it has a design plan with supportable technologies to meet its RDOF Phase I public interest obligations in the areas covered by its winning bids, by submitting technical information to support the operational assertions made;²² and

e. certified to the FCC that it will have available funds for all project costs that exceed the amount of RDOF support to be received for the first two years of its support term and also described how the required construction will be funded.²³

14. PRVC's commitment to comply with the service requirements applicable to the federal universal service support that it receives satisfies the Commission's requirement that applicants for ETC designation must comply with these federal universal service requirements.²⁴

15. PRVC commits that its FTTH 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.²⁵

²¹ *Id.* at 6166 (¶ 299) (citing 47 CFR § 54.804(b)(2)(iii)).

²² *Id.* at 6167 (¶ 301) (citing 47 CFR § 54.804(b)(2)(iv)).

²³ *Id.* at 6174 (¶ 312) (citing 47 CFR §§ 54.804(b)(2)(v), 54.804(b)(2)(vi)).

²⁴ *See November 2012 Order* at 5 (ordering clauses 3 and 4).

²⁵ *See* 47 CFR § 54.202(a)(2) (providing that a common carrier seeking an ETC designation by the FCC must "[d]emonstrate its ability to remain functional in emergency situations, including a demonstration that

16. Under the FCC’s regulations, an ETC applicant must “[d]emonstrate that it will satisfy applicable consumer protection and service quality standards.”²⁶ PRVC commits to satisfying all FCC requirements related to consumer protection and service quality standards. In addition, with respect to Lifeline service, PRVC commits that it will annually certify compliance with consumer protection and service quality rules consistent with Section 54.422(b)(3) of the FCC’s rules.²⁷

17. PRVC commits that it will offer the supported services specified in Section 214(e)(1)(A) of the Act²⁸ throughout its proposed ETC designation area.²⁹

18. PRVC commits to comply with: (1) all applicable provisions of the Commission’s Rules and Regulations Governing Public Utility Service;³⁰ (2) “designated service quality standards applicable to each carrier;”³¹ and (3) the requirement to submit to the Commission the number of consumer complaints per 1,000 access lines, as required in annual ETC filings.³²

19. PRVC commits that it will advertise the availability of its broadband and interconnected VoIP-enabled voice services, and their associated charges, in media of general

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 managing traffic spikes resulting from emergency situations”). PRVC’s commitment also satisfies the requirements of Section I.A.2.a. of the ETC Checklist (emergency operations).

²⁶ 47 CFR § 54.202(a)(3).

²⁷ *Id.*, § 54.422(b)(3).

²⁸ 47 U.S.C. § 214(e)(1)(A).

²⁹ ETC Checklist, § I.A.1.b.iv.

³⁰ *Id.*, § I.A.3.b.i.

³¹ *Id.*, § I.A.3.b.ii.

³² *Id.*, § I.A.3.b.iii.

distribution,³³ and that it will include Lifeline services in its advertising materials.³⁴ PRVC will communicate its fiber availability and construction progress to its potential customers³⁵ in three or more, or any combination of, the following methods:

- a. Direct mail (e.g., postcards, letters);
- b. Door hangers or similar door-to-door communications;
- c. Electronic mail;
- d. Social media or similar electronic communications;
- e. Online (with the option to subscribe);
- f. Live events (with the option to subscribe); and/or
- g. Other forms of advertising.

20. PRVC will offer Lifeline service in compliance with FCC rules. The Commission's ETC Checklist requires information concerning Lifeline plans that an applicant for ETC designation intends to offer.³⁶ PRVC commits to implement its Lifeline plans in accordance with the current rules and policies adopted by the FCC.

21. PRVC will price its Lifeline service at discounted rates and pass through the monthly support amounts for voice and/or broadband services established by the FCC. PRVC's Lifeline service will represent a dollar-for-dollar reduction from its comparable non-Lifeline rates, providing a pass-through of the full amount of federal Lifeline support to qualifying customers.

³³ *Id.*, § I.A.1.b.i. See 47 CFR § 54.201(d)(2).

³⁴ ETC Checklist, § I.A.1.b.i.

³⁵ Nothing herein shall be interpreted to require the disclosure of any competitive data or information by PRVC. PRVC may in its business judgment determine the timing of such communications. PRVC is expected to inform potential customers of the availability of service in advance of or, at a minimum, simultaneously with such service availability in specific areas. Upon request, PRVC shall also provide its best estimate as to service availability in response to customer inquiries.

³⁶ *Id.*, § I.A.1.b.ii.

22. PRVC commits to adhering to any FCC reporting requirements relating to the reporting of service outages, and also commits to provide copies of any such reports to the Commission, upon request.³⁷

23. As a prerequisite to receiving RDOF support, PRVC is required to certify to the FCC “that it is financially and technically capable of meeting the relevant public interest obligations for each performance tier and latency combination in the geographic areas in which it seeks support.”³⁸ With respect to financial resources, PRVC will be able to rely on PRVEPA for loan funds at market rates, advances of capital and loaned or leased employee support by PRVC, if necessary, in addition to the RDOF Phase I support being made available to the Applicant. In addition, PRVC must obtain an irrevocable standby letter of credit from a bank acceptable to the FCC.³⁹ Therefore, PRVC is financially capable of providing supported services in accordance with FCC and Commission rules.

24. With respect to technical capabilities, PRVC is required to submit a detailed technology and system design description that explains how the design and technologies chosen will meet the relevant performance requirements, including information regarding quality, coverage, voice service, network management and on-going operations. This submission must include a detailed network diagram. The network diagram must be certified by a professional engineer.⁴⁰ Further, PRVC must “provide a project plan that describes a network build-out

³⁷ *Id.*, § I.A.2.b.

³⁸ *Auction 904 Public Notice*, 35 FCC Rcd at 6166 (¶ 298) (footnote omitted).

³⁹ *Id.* at 6177 (¶ 319).

⁴⁰ *Id.* (footnotes omitted). The FCC’s requirements include a certification from a professional engineer that the long-form applicant’s fiber optic network is capable of delivering voice and broadband service that meets the requisite performance requirements and is capable of providing sufficient capacity to meet customer demand at or above the prescribed levels during peak usage periods. *Id.*

schedule that includes but is not restricted to plans for constructing last mile and middle mile facilities.”⁴¹ These various FCC requirements ensure that PRVC possesses the financial and technical capabilities to pay for all start-up expenses (*e.g.*, equipment, operations, *etc.*) to deploy its fiber optic network, and to begin the provision of interconnected VoIP-enabled voice and broadband services throughout its proposed ETC designation area.

25. Designating PRVC as an ETC will clearly serve the public interest by enabling the Company to provide low-latency, gigabit-speed broadband, and interconnected VoIP-enabled voice services, to consumers in its proposed ETC designation area, as well as to provide subsidized voice and broadband services to those households that seek and qualify for federal Lifeline benefits. PRVC is well-positioned to help close the digital divide in its service area, allowing improved access to health care, education services, and other social services, helping to create jobs and boosting the economy. Approval of PRVC’s ETC application will help to address the urgent need to deliver broadband to rural Mississippi, enabling consumers and businesses in these regions of the state to have access to broadband services comparable to those in urban areas.

26. PRVC’s service offerings will preserve and advance universal service⁴² by providing unique advantages to consumers in its proposed ETC designation area. Most importantly, the Company’s provision of high-speed broadband Internet access and interconnected VoIP-enabled voice services using a new state-of-the-art, low-latency, FTTH network will provide enormous benefits that previously have been beyond the reach of consumers and businesses in many of Mississippi’s rural areas. The FTTH network will ensure reliable access to gigabit tier

⁴¹ *Id.* at 6171 (¶ 307).

⁴² ETC Checklist, § I.B.1.

broadband, thus enhancing educational programs, promoting business growth, generating jobs, and expanding cultural opportunities for Mississippi residents.

27. Designation of PRVC as an ETC in Mississippi will also ensure the availability of quality services at just, reasonable, and affordable rates⁴³ by facilitating the provision of high-quality communications services to those living and working within its proposed ETC designation area.

28. PRVC seeks a waiver of the ETC Checklist requirement for the submission of a five-year improvements and upgrades plan. Such a waiver is appropriate because deployment obligations and timetables imposed on RDOF Phase I support recipients by the FCC are sufficient to ensure timely deployment of voice and broadband services, consistent with the policies reflected in the Commission's five-year plan requirement. Specifically, the FCC requires RDOF Phase I support recipients to commercially offer voice and broadband service to "40% of [a calculated] number of locations in a state by the end of the third full calendar year following funding authorization, and 20% each calendar year thereafter."⁴⁴ In addition, the FCC requires support recipients to file annual reports containing location and technology data, and to certify when they have met their service milestones.⁴⁵

29. PRVC meets all the statutory and regulatory requirements for designation as an ETC in the State of Mississippi and is in full compliance with all applicable Commission orders, rules, and regulations and, therefore, is in good standing with the Commission.⁴⁶

IT IS, THEREFORE, ORDERED by the Commission that:

⁴³ ETC Checklist, § I.B.2.

⁴⁴ *RDOF Order*, 35 FCC Rcd at 709 (¶ 45).

⁴⁵ *Id.* at 712 (¶ 56).

⁴⁶ ETC Checklist, § I.A.1.b.v.

1. PRVC, LLC's Application for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Phase I Auction (Auction 904) Support for Voice and Broadband Services in the State of Mississippi is hereby approved. Designation of PRVC as an ETC in the State of Mississippi in the census blocks identified in Exhibit A1 and A2 of its ETC application is in the public interest.

2. PRVC is hereby granted a waiver of the ETC Checklist requirement for the submission of a five-year improvements and upgrades plan. Such a waiver is appropriate because deployment obligations and timetables imposed on RDOF Phase I support recipients by the FCC are sufficient to ensure timely deployment of voice and broadband services, consistent with the policies reflected in the Commission's five-year plan requirement.

3. At least thirty days before offering service within its ETC designation area, PRVC shall provide an informational tariff for its ETC designated areas in Exhibits A1 and A2 that outlines its regulatory contact information, customer service contact, terms, and conditions as well as Lifeline Programs. PRVC will also post this same information on its website where rates, terms and conditions may be found.

4. PRVC will file any future changes to its informational tariff with the Commission at least seven days prior to the effective date of change.

5. At least thirty days before offering service within its ETC designation area, PRVC will provide Staff copies of marketing materials, including advertising specific to Lifeline.

6. PRVC will comply, where applicable, with service and reporting requirements of the FCC's High-Cost and Lifeline Programs, the Commission's ETC Docket 2005-AD-662, and the Commission's Lifeline Docket 2007-AD-487.

7. Exceptions to this Recommended Order may be filed with the Commission within a period of fifteen (15) days from the date of issuance of this Order, in accordance with the provisions of Miss. Code Ann. § 77-3-40. If exceptions are not timely filed, this Recommended Order shall then become the Order of the Commission.

This Order shall be deemed issued on the day it is served upon the parties herein by the Executive Secretary of this Commission who shall note the service date in the file of this Docket.

SO ORDERED and this the 6th day of April, 2021.



MISSISSIPPI PUBLIC SERVICE COMMISSION

DANE MAXWELL, COMMISSIONER

ATTEST: A true copy

Katherine Collier, Executive Secretary

Effective this the 6th day of April, 2021.

FILED

JAN 06 2021

MISS. PUBLIC SERVICE
COMMISSION

Before the
MISSISSIPPI PUBLIC SERVICE COMMISSION

Application of Pearl River Valley
Communications, LLC
For Designation as an Eligible
Telecommunications Carrier
Pursuant to Section 214(e)(2) of the
Communications Act of 1934
In the State of Mississippi

Docket No. '21-UA-14

APPLICATION OF PEARL RIVER VALLEY COMMUNICATIONS, LLC
FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER

Pursuant to Section 214(e)(2) of the Communications Act of 1934 (the "Act"),¹ the *November 2012 Order*,² and other applicable rules and orders of the Commission, Pearl River Valley Communications, LLC ("PRVC," the "Applicant," or the "Company"), hereby files this Application with the Mississippi Public Service Commission ("Commission") for designation as an Eligible Telecommunications Carrier ("ETC") in the State of Mississippi.

This designation is sought in all areas where PRVC, through the participation of its parent, Pearl River Valley Electric Power Association ("PRVEPA" or "Association") in the Rural Electric

¹ 47 U.S.C. § 214(e)(2).

² *In the Matter of Eligible Telecommunications Carrier Designation for Federal Universal Service Support*, Docket No. 2005-AD-662, Order on Rehearing Reforming and Modernizing Universal Service Support and Adopting Changes of FCC Order 11-161 (adopted Nov. 15, 2012) (*November 2012 Order*). An "Eligible Telecommunications Carrier ('ETC') Checklist, Revised to Reflect Changes of FCC 11-161" ("ETC Checklist") is attached as Exhibit A of the *November 2012 Order*. In 2018, the Commission sought comment on amending the ETC Checklist, stating that "[a]fter receipt of comments and reply comments, the Commission will issue an appropriate Order regarding the revised checklist." *In the Matter of ETC Designation for Federal Universal Service Support*, Docket No. 2005-AD-662, Order Amending Checklist and Updating Reporting Requirements (adopted Nov. 6, 2018). Further Commission action is pending.

Cooperative Consortium, has been allocated Rural Digital Opportunity Fund ("RDOF") Phase I support by the Federal Communications Commission ("FCC") as a winner in the RDOF Phase I auction ("Auction 904"),³ as well as Lifeline-only ETC designation status in additional areas.

I. INTRODUCTION.

PRVC meets all of the statutory and regulatory requirements and prerequisites for ETC designation by the Commission. Designation of PRVC as an ETC in the State of Mississippi will serve the public interest by enabling the Company to provide subsidized voice and gigabit tier broadband services to consumers and businesses in rural areas that it proposes to serve.

If designated as an ETC, PRVC will use high-cost support to assist with the deployment of its voice and gigabit tier broadband network to serve consumers throughout its proposed ETC designation area; to offer and maintain high-quality voice and broadband services to customers; and to ensure the reliability of its network providing advanced broadband services to the public. Additionally, PRVC will provide Lifeline discounted service to qualifying low-income customers who reside within the Company's service areas in the State of Mississippi and who may otherwise not be able to afford service.

PRVC is obligated by the FCC to obtain ETC designation status by June 7, 2021, which is 180 days after the announcement by the FCC on December 7, 2020, that the Company is a winning bidder in the RDOF Phase I auction in the census blocks in which the Company was awarded

³ *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021*, AU Docket No. 20-34, WC Docket No. 19-126, WC Docket No. 10-90, FCC Public Notice, DA 20-1422 (Dec. 7, 2020). The Rural Electric Cooperative Consortium submitted a short-form application in the RDOF Phase I auction that included PRVEPA as a consortium member.

RDOF Phase I support.⁴ As a result, PRVC requests expeditious action by the Commission so that the Company may meet this FCC requirement.

Please address all correspondence, communications, pleadings, notices, orders, and decisions relating to this Application to:

Lawrence E. Hahn
McNeese & Hahn, PLLC
338 Church Street
P.O. Drawer 948
Columbia, MS 39429
E-mail: lhahn@mcneesehahn.com

II. BACKGROUND.

PRVC is a wholly-owned subsidiary of PRVEPA, a non-profit rural electric cooperative that is owned by its members, and is organized and existing under the laws of the State of Mississippi. PRVEPA received its certificate of incorporation from the Mississippi Secretary of State in 1938. The Association currently serves its members in Covington, Forrest, Jefferson Davis, George, Jackson, Perry, Lamar, Lawrence, Marion, Pearl River, Stone, and Walthall counties.⁵ It has 6,131 total miles of lines and more than 51,000 meters served.⁶

PRVC, a domestic limited liability company formed in the State of Mississippi in August of this year, will, in coordination with PRVEPA, deploy and operate a new state-of-the-art, low-latency, fiber-to-the-home ("FTTH") network, and will provide high-speed broadband Internet access and interconnected Voice over Internet Protocol ("VoIP")-based voice services to customers in its service area, many of whom currently lack any access to such services. PRVC will eventually make access to FTTH services available to all members in PRVEPA's service area.

⁴ *Rural Digital Opportunity Fund, et al.*, WC Docket No. 19-126, *et al.*, Report and Order, 35 FCC Rcd 686, 727 (¶ 92) (2020) ("RDOF Order") (establishing the 180-day deadline).

⁵ PRVEPA Website, accessed at <https://www.prvepa.com/my-co-op>.

⁶ *Id.*

PRVC will deploy broadband and interconnected VoIP-based voice services throughout the RDOF Phase I-eligible census blocks identified in Exhibit A1 and seeks High-Cost and Low-Income (Lifeline) ETC designation from the Commission to serve these census blocks. In addition, Applicant seeks Lifeline-only ETC designation status in additional areas primarily consisting of PRVEPA's electric service footprint, identified in Exhibit A2. A map of PRVC's proposed ETC designation area is displayed in Exhibit B.

PRVC will offer low-latency broadband service at actual speeds of at least 1 gigabit per second downstream and 500 Mbps upstream, and will offer at least 2 terabytes of monthly usage. In addition, Applicant will provide its customers with voice-grade access to the Public Switched Telephone Network ("PSTN") through its provision of interconnected VoIP service.

PRVC is in full compliance with all applicable Commission orders, rules, and regulations, and therefore is in good standing with the Commission.⁷

III. THE COMMISSION HAS JURISDICTION AND AUTHORITY TO DESIGNATE ELIGIBLE TELECOMMUNICATIONS CARRIERS.

Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section 214(e)(2) shall be eligible to receive specific federal universal service support."⁸ Section 214(e)(2) of the Act provides that state commissions "shall designate" common carriers that meet the statutory requirements as ETCs. The FCC has ruled that Section 214(e)(2) of the Act "provides state commissions with the *primary* responsibility for designating ETCs."⁹

Moreover, the Commission has stated that the FCC has "charge[d] states with the authority and obligation to certify that all federal high-cost and CAF [Connect America Fund] support is

⁷ ETC Checklist, § I.A.1.b.v.

⁸ 47 U.S.C. § 254(e).

⁹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 20 FCC Red 6371, 6372 (¶ 1, n.2) (2005) (emphasis added) (interpreting 47 U.S.C. § 254(e)(2)).

being used by carriers in a manner for which the support is intended[.]”¹⁰ and that “Section 77-3-35 explicitly authorizes the Commission to regulate and further the provision of universal service”¹¹

Therefore, the Commission has the authority and the primary responsibility under federal law to designate PRVC as an ETC for federal universal service support purposes. The *November 2012 Order* and Section I of the ETC Checklist establish the requirements that an applicant must meet in order to be designated as an ETC.

IV. PRVC MEETS ALL FEDERAL AND STATE STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER.

As demonstrated in the following sections, PRVC satisfies each of the statutory and regulatory requirements for designation as an ETC, as set forth in the Act, in the FCC’s rules, and in the rules and orders of the Commission.

A. PRVC Will Provide Service as a Common Carrier.

To be designated as an ETC, an applicant must be a common carrier.¹² For the customers and locations where RDOF Phase I support has been allocated, PRVC will provide its services on a common carrier basis. PRVC is a common carrier for purposes of Section 214(e) of the Act.¹³

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

¹⁰ *November 2012 Order* at 3 (¶ 8).

¹¹ *Id.* at ¶ 11 (citing M.C.A. §77-35).

¹² 47 U.S.C. § 214(e)(1) (providing that a “common carrier” must be designated as an ETC to receive universal service support). The Act defines a “common carrier” as “any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or interstate or foreign radio transmission of energy” 47 U.S.C. § 153(11).

¹³ 47 U.S.C. § 214(e).

To be designated as an ETC, an applicant must offer throughout its proposed service areas the services set forth in Section 54.101(a) of the FCC's rules,¹⁴ either by using its own facilities or a combination of its own facilities and the resale of another carrier's services.

PRVC commits to offer all of the services designated for support by the FCC.¹⁵ As discussed in the following sections, the Company will offer, upon designation as an ETC, all of the supported services throughout the areas in which the Company is requesting designation as an ETC. The Company commits to provide these services consistent with applicable FCC rules relating to high-cost universal service support.¹⁶

1. Voice Grade Access to the Public Switched Telephone Network.

Section 54.101(b) of the FCC's rules states that an ETC must provide "voice telephony service" in order to receive federal universal support.¹⁷ Section 54.101(a)(1) provides that:

Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying low-income consumers¹⁸

PRVC will meet this requirement through the provision of VoIP-based voice communications service that is interconnected to the PSTN. The Company will be legally responsible for

¹⁴ 47 CFR § 54.101(a).

¹⁵ See *Designation of Fort Mojave Telecommunications, Inc., et al., as Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, AAD/USB File No. 98-28, Memorandum Opinion and Order, 13 FCC Rcd 4547, 4552 (¶ 11) (CCB, OMD 1998) ("*Fort Mojave*"). In *Fort Mojave*, the Common Carrier Bureau and the Office of the Managing Director indicated that the FCC will designate carriers as ETCs, pursuant to Section 214(e)(6) of the Act, upon finding that they "offer or will be able to offer" the supported services throughout the service area.

¹⁶ This commitment also complies with Section I.A.1.a. of the ETC Checklist (required services).

¹⁷ 47 CFR § 54.101(b).

¹⁸ *Id.*, § 54.101(a)(1).

dealing with customer problems, providing quality of service guarantees, and meeting universal service-related requirements.

PRVC 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 service via E-911, wherever available from local government or public safety organizations. The Company also commits to provide toll limitation services to qualifying low-income consumers as provided in Sections 54.400-54.423 of the FCC's rules.¹⁹

2. Broadband Internet Access Services.

PRVC's broadband Internet offering will provide the capability to transmit data to, and receive data from, all or substantially all Internet endpoints, including any capabilities that are incidental to, and enable the operation of, communications services.²⁰ Applicant will (1) offer low-latency Internet service at actual speeds of at least 1 Gbps downstream and 500 Mbps upstream; (2) offer at least 2 terabytes of monthly usage to customers within its proposed ETC designation area; and (3) offer such service at rates that are reasonably comparable to urban rates.

3. Lifeline Service.

¹⁹ *Id.*, §§ 54.400-54.423. PRVC's compliance and commitments with respect to the applicable federal rules also constitute compliance with Section I.A.4. of the ETC Checklist (voice telephony service).

²⁰ See 47 CFR § 54.101(a)(2) (stating that "[e]ligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service").

As required by Section 54.405(a) of the FCC's rules,²¹ PRVC will offer subsidized Lifeline voice and broadband services, including a standalone voice service offering, to qualifying low-income consumers within its proposed ETC designation area in accordance with the FCC's rules.²²

C. PRVC Will Comply with Applicable Service and Performance Quality Requirements Adopted by the FCC.

PRVC will comply with the RDOF service requirements applicable to the federal universal service support that it receives,²³ including the requirements for receipt of RDOF Phase I support.

Specifically, PRVC, as a "long-form" applicant for RDOF Phase I support,²⁴ must:

(1) certify in its long-form application filed with the FCC that it complies with all statutory and regulatory requirements for receiving the universal service support that it seeks as of the long-form application filing deadline;²⁵

(2) certify to the FCC that it is financially and technically capable of meeting the relevant public interest obligations for each performance tier and latency combination in the geographic areas in which it seeks support;²⁶

(3) certify to the FCC that it will meet the relevant public interest obligations for each performance tier and latency combination for which it was deemed a winning bidder,

²¹ *Id.*, § 54.405(a).

²² *Id.*, §§ 54.400-54.423.

²³ See ETC Checklist, § I.A.1.b.vi.

²⁴ Each Auction 904 winning bidder "is required to file an application for Rural Digital Opportunity Fund support, referred to as a long-form application" *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, AU Docket No. 20-34, *et al.*, Public Notice, 35 FCC Rcd 6077, 6163 (¶ 286) (2020) ("Auction 904 Public Notice").

²⁵ *Id.* at 6165 (¶ 296) (citing 47 CFR § 54.804(b)(2)(v)).

²⁶ *Id.* at 6166 (¶ 298) (citing 47 CFR § 54.804(b)(2)(ii)).

including the requirement that it will offer service at rates that are equal to or lower than the FCC's reasonable comparability benchmarks for fixed services offered in urban areas;²⁷

(4) demonstrate to the FCC that it has a design plan with supportable technologies to meet the relevant RDOF public interest obligations in the areas covered by the winning bids, by submitting technical information to support the operational assertions made in the short-form application;²⁸ and

(5) certify to the FCC that it will have available funds for all project costs that exceed the amount of RDOF support to be received for the first two years of its support term, and also describe how the required construction will be funded.²⁹

PRVC's commitment to comply with the service requirements applicable to the federal universal service support that it receives satisfies the Commission's requirement that applicants for ETC designation must comply with these federal service requirements.³⁰

D. Ability to Remain Functional in Emergency Situations.

PRVC commits 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.³¹

²⁷ *Id.* at 6166 (¶ 299) (citing 47 CFR § 54.804(b)(2)(iii)).

²⁸ *Id.* at 6167 (¶ 301) (citing 47 CFR § 54.804(b)(2)(iv)).

²⁹ *Id.* at 6174 (¶ 312) (citing 47 CFR §§ 54.804(b)(2)(v), 54.804(b)(2)(vi)).

³⁰ *See November 2012 Order* at 5 (ordering clauses 3 and 4).

³¹ *See* 47 CFR § 54.202(a)(2) (providing that a common carrier seeking an ETC designation by the FCC must "[d]emonstrate 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 managing traffic spikes resulting from emergency situations"). PRVC's commitment also satisfies the requirements of Section I.A.2.a. of the ETC Checklist (emergency operations).

E. Satisfaction of Applicable Consumer Protection and Service Quality Standards.

Under the FCC's regulations, an ETC applicant must "[d]emonstrate that it will satisfy applicable consumer protection and service quality standards."³² PRVC commits to satisfying all FCC requirements related to consumer protection and service quality standards. In addition, with respect to Lifeline service, Applicant commits that it will annually certify compliance with consumer protection and service quality rules consistent with Section 54.422(b)(3) of the FCC's rules.³³

F. PRVC Meets the Requirements Adopted by the Mississippi Public Service Commission To Be Designated as an Eligible Telecommunications Carrier.

PRVC will meet each of the requirements applicable to ETCs adopted by the Commission, as described in the following sections.

1. Offering of Supported Services in Proposed ETC Designation Area.

PRVC commits that it will offer the supported services specified in Section 214(e)(1)(A) of the Act³⁴ in its proposed ETC designation area.³⁵

2. Consumer Protection.

In addition to complying with federal requirements, as discussed in Section IV.E., *supra*, PRVC commits to comply with (1) all applicable provisions of the Commission's Rules and Reg-

³² 47 CFR § 54.202(a)(3).

³³ *Id.*, § 54.422(b)(3).

³⁴ 47 U.S.C. § 214(e)(1)(A).

³⁵ ETC Checklist, § I.A.1.b.iv.

ulations Governing Public Utility Service, along with any amendments made in the future proceeding regarding RDOF ETCs;³⁶ (2) “designated service quality standards applicable to each carrier;”³⁷ and (3) the requirement to submit to the Commission the number of consumer complaints per 1,000 access lines, as required in annual ETC filings.³⁸

3. Advertising.

PRVC commits that it will advertise the availability of its broadband and interconnected VoIP-based voice services, and their associated charges, in media of general distribution,³⁹ and that it will include Lifeline services in its advertising materials.⁴⁰

4. Lifeline Plans.

As noted in Section IV.B.3., *supra*, PRVC will offer Lifeline service in compliance with the FCC’s rules. The ETC Checklist requires information concerning Lifeline plans that an applicant for ETC designation intends to offer.⁴¹ PRVC commits to implement its Lifeline plans in accordance with the current rules, policies, and requirements adopted by the FCC.

PRVC will price its Lifeline voice and broadband services at discounted rates and pass through the monthly support amounts for voice and broadband services established by the FCC and in effect from time to time. Therefore, PRVC’s Lifeline service will represent a dollar-for-dollar reduction from its comparable non-Lifeline rates, and will represent a pass-through of the full amount of Lifeline support to the qualifying Lifeline consumer.

³⁶ *Id.*, § I.A.3.b.i.

³⁷ *Id.*, § I.A.3.b.ii.

³⁸ *Id.*, § I.A.3.b.iii.

³⁹ *Id.*, § I.A.1.b.i. *See* 47 CFR § 54.201(d)(2).

⁴⁰ ETC Checklist, § I.A.1.b.i.

⁴¹ *Id.*, § I.A.1.b.ii.

5. Contact Information for Consumer Inquiries.

The following contact information for PRVC's designated representative is provided for the purpose of assisting in the resolution of any customer service, quality of service, or Lifeline inquiries:⁴²

Leif Munkel – Manager, Member Services
Pearl River Valley Communications, LLC
1422 Hwy. 13 North
Columbia, MS 39429
601-736-2666
Email – lmunkel@prvepa.com

The designated representative shall be aware of the Commission's jurisdiction over consumer protection standards regarding ETCs and shall be familiar with the Commission's Rules Governing Public Utility Service and any subsequent orders of the Commission regarding customer service and quality of service obligations. The designated representative shall comply with any reporting requirements regarding any Commission action on customer service, quality of service or Lifeline inquiries or other Commission action on customer service, quality of service or Lifeline inquiries or other Commission action regarding ETC obligations. In the event that PRVC replaces the designated representative, notice and contact information provided herein shall be filed with the Commission within seven days.

6. Outage Reporting.

PRVC commits to adhering to any FCC reporting requirements relating to the reporting of service outages, and also commits to provide copies of any such reports to the Commission, upon request.⁴³

⁴² *Id.*, § I.A.1.b.iii.

⁴³ *Id.*, § I.A.2.b.

V. PRVC HAS SUFFICIENT FINANCIAL RESOURCES AND TECHNICAL CAPABILITIES TO PROVIDE THE SUPPORTED SERVICES.

As noted in Section IV.C., *supra*, as a prerequisite to receiving RDOF support, PRVC is required to certify to the FCC “that it is financially and technically capable of meeting the relevant public interest obligations for each performance tier and latency combination in the geographic areas in which it seeks support.”⁴⁴ PRVC will be able to rely upon the resources of PRVEPA, it will be able to obtain requisite amounts of lending pursuant to available lines of credit, and PRVC and PRVEPA will be able to obtain additional financing, if necessary, in addition to the RDOF Phase I support being made available to PRVC. In addition, PRVC must obtain an irrevocable standby letter of credit from a bank acceptable to the FCC.⁴⁵

With respect to technical capabilities, PRVC must “demonstrate that it has a design plan with supportable technologies to meet the relevant Rural Digital Opportunity Fund public interest obligations in the areas covered by the winning bids by submitting technical information to support the operational assertions made in the short-form application.”⁴⁶ In addition, the Company:

is required to submit a detailed technology and system design description that explains how the design and technologies chosen will meet the relevant performance requirements, including information regarding quality, coverage, voice service, network management and on-going operations. This submission must include a detailed network diagram. The network diagram must be certified by a professional engineer.⁴⁷

⁴⁴ *Auction 904 Public Notice*, 35 FCC Rcd at 6166 (¶ 298) (footnote omitted).

⁴⁵ *Id.* at 6177 (¶ 319).

⁴⁶ *Id.* at 6166 (¶ 301).

⁴⁷ *Id.* (footnotes omitted). The FCC’s requirements include a certification from a professional engineer that the long-form applicant’s fiber optic network is capable of delivering voice and broadband service that meets the requisite performance requirements, and is capable of providing sufficient capacity to meet customer demand at or above the prescribed levels during peak usage periods. *Id.*

The Company also must “provide a project plan that describes a network build-out schedule that includes but is not restricted to plans for constructing last mile and middle mile facilities.”⁴⁸

These various FCC requirements ensure that PRVC possesses the financial and technical capabilities to pay for all start-up expenses (*e.g.*, equipment, operations, *etc.*) to deploy a fiber optic network, and to begin the provision of interconnected VoIP-based voice service and broadband service throughout its proposed ETC designation area.

VI. DESIGNATION OF PRVC AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER WILL SERVE THE PUBLIC INTEREST.

The Commission’s rules require it to undertake a public interest analysis of an application for ETC designation, which is carried out in a manner consistent with the Act and FCC rules,⁴⁹ and which considers whether an applicant for ETC designation has satisfied public interest criteria, considering general goals established by the Commission.⁵⁰

The grant of this Application, designating PRVC as an ETC, will clearly serve the public interest by enabling the Company to utilize RDOF support⁵¹ to provide low-latency, gigabit-speed broadband, and interconnected VoIP-based voice services, to consumers in its proposed ETC designation area, as well as to provide subsidized voice and broadband services to those households that seek and qualify for federal Lifeline benefits.

⁴⁸ *Id.* at 6171 (¶ 307).

⁴⁹ ETC Checklist, § I.B. (citing 47 U.S.C. §§ 214(e)(2), 254; 47 CFR §§ 54.201(c), 54.202(b)).

⁵⁰ *Id.*

⁵¹ Focusing on the importance of the availability of federal funding for use in the deployment of broadband services in rural Mississippi, the Commission has been “monitor[ing] the progress of the RDOF [program] and roll out of the rules guiding the reverse auction format and the maps that the FCC will use to determine area eligibility.” *Rural Broadband/Internet Issues, FCC Approves \$20.4 Billion Rural Broadband Fund*, From the Desk of Commissioner Brent Bailey, Central District Office (Mar. 16, 2020), *accessed at* https://www.psc.ms.gov/sites/default/files/2020-03/FromtheDeskOfBB_RURALBROADBAND_INTERNETISSUES.pdf.

The Commission has been actively engaged in addressing the needs of consumers and businesses in rural Mississippi for access to advanced broadband services. In April of this year, for example, the Commission, in a letter to Mississippi's U.S. Senator Roger Wicker, urged that the disbursement of RDOF Phase I funding should be expedited to help improve Internet access in rural communities throughout Mississippi.⁵² The Commission stressed that:

the severe lack of broadband Internet for all Mississippians has been brought to the forefront and cannot be overstated Teachers and students are conducting distance learning. Health care professionals are relying on telemedicine It is undeniable that the success of these efforts and functions rely on an essential service that simply does not exist.⁵³

Grant of this Application will further help to address the urgent need to deliver broadband to rural Mississippi, enabling consumers and businesses in these regions of the state to have access to broadband services comparable to those in urban areas.

A. Preserving and Advancing Universal Service.

PRVC's service offerings will preserve and advance universal service⁵⁴ by providing unique advantages to consumers in its proposed ETC designation area. Most importantly, the Company's deployment of a new state-of-the-art, low-latency, FTTH network, providing high-speed broadband Internet access and interconnected VoIP services, will provide enormous benefits that previously have been beyond the reach of consumers and businesses in many of Mississippi's rural areas. The Company's FTTH network will ensure reliable access to gigabit tier broadband, thus enhancing educational programs, promoting business growth, generating jobs, and expanding opportunities for Mississippi residents.

⁵² Taylor Vance, "Mississippi Utility Commission Urges Broadband Investment," NORTHEAST MISSISSIPPI DAILY JOURNAL (Apr. 30, 2020), *accessed at* <https://www.govtech.com/network/Mississippi-Utility-Commission-Urges-Broadband-Investment.html>.

⁵³ *Id.* (internal quotation marks omitted).

⁵⁴ ETC Checklist, § I.B.1.

B. Ensuring the Availability of Quality Services at Just, Reasonable, and Affordable Rates.

A principal goal of the Telecommunications Act of 1996 is to “promote competition and reduce regulation in order to secure lower prices and high-quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies.”⁵⁵ As a general matter, designation of competitive ETCs increases facilities and promotes development and deployment of advanced communications as carriers compete for consumers’ business.

Designation of PRVC as an ETC in Mississippi will ensure the availability of quality services at just, reasonable, and affordable rates⁵⁶ by facilitating the provision of high-quality communications services to those living and working within its proposed ETC designation area. Residents in many rural areas in Mississippi have long been unable to gain access to competitive voice service and advanced broadband services that are available to consumers living in urban areas in the State. In some rural areas, no meaningful choices for telephone and broadband services exist.

The Company’s deployment of low-latency, high-speed broadband service and high-quality VoIP phone services will help to address these issues, will promote economic development in the rural areas the Company will serve, and, significantly, will help to ensure that consumers in its proposed ETC designation area will be able to subscribe to quality services at just, reasonable, and affordable rates.

C. Promoting the Deployment of Advanced Telecommunications Services and Information Services in Rural and High-Cost Areas.

⁵⁵ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) (preamble).

⁵⁶ ETC Checklist, § I.B.2.

In the *RDOF Order*, the FCC explains that “[b]ringing digital opportunity to Americans living on the wrong side of the digital divide continues to be the Federal Communication Commission’s top priority.... Without access to broadband, rural communities cannot connect to the digital economy and the opportunities for better education, employment, healthcare, and civic and social engagement it provides.”⁵⁷

There are compelling grounds for the Commission to conclude that granting PRVC’s application for ETC designation is in the public interest because Applicant will utilize RDOF support to bring state-of-the-art low-latency, gigabit-speed broadband service to rural consumers, businesses, and communities in Mississippi. The Commission’s action in granting this Application will promote this deployment, for the benefit of rural areas in Mississippi that have long been on the wrong side of the digital divide.

VII. REQUEST FOR WAIVER OF REQUIREMENT TO SUBMIT A FIVE-YEAR UPGRADES OR IMPROVEMENTS PLAN.

The Commission’s ETC Checklist requires that, to be eligible for an ETC designation, “[a]t the time of filing for designation, the ETC applicant shall be expected to submit a five year plan that describes with specificity the proposed improvements or upgrades to the applicant’s network throughout its proposed service area”⁵⁸

PRVC seeks a waiver of this ETC Checklist requirement for the submission of a five-year improvements and upgrades plan. Such a waiver is appropriate because deployment obligations and timetables imposed on RDOF Phase I support recipients by the FCC in the *RDOF Order* are sufficient to ensure timely deployment of voice and broadband services, consistent with the policies reflected in the Commission’s five-year plan requirement.

⁵⁷ *RDOF Order*, 35 FCC Rcd at 687 (¶ 1).

⁵⁸ ETC Checklist, § I.A.1.c.

Specifically, the FCC requires RDOF Phase I support recipients to commercially offer voice and broadband service to “40% of [a calculated] number of locations in a state by the end of the third full calendar year following funding authorization, and 20% each calendar year thereafter.”⁵⁹ In addition, the FCC requires support recipients to file annual reports containing location and technology data, and to certify when they have met their service milestones.⁶⁰

The FCC has previously decided that similar service milestones and reporting requirements applicable to Connect America Fund (“CAF”) Phase II support recipients warranted waiver by the FCC of its requirement, in Section 54.202(a)(1)(ii) of its rules,⁶¹ that support recipients must file five-year improvement plans. The FCC found that its detailed buildout obligations for CAF Phase II support recipients provide a “more defined yardstick [than the five-year improvement plans] by which to measure [carriers’] progress towards the universal availability of voice and broadband service in their areas”⁶²

Significantly, the Commission also has waived its ETC Checklist five-year plan requirement in response to a request for waiver made by an applicant for ETC designation. Specifically, the Commission found that Aristotle Unified Communications, Inc. (“AUC”), was entitled to a waiver of the ETC Checklist requirement because of the build-out plan requirements the FCC had adopted for CAF Phase II support recipients.⁶³

⁵⁹ *RDOF Order*, 35 FCC Rcd at 709 (¶ 45).

⁶⁰ *Id.* at 712 (¶ 56).

⁶¹ 47 CFR § 54.202(a)(1)(ii).

⁶² *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket No. 09-197, *et al.*, Public Notice, 33 FCC Rcd 6696, 6700 & n.34 (quotation marks and citation omitted).

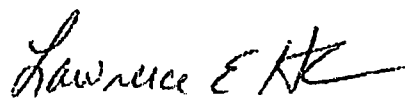
⁶³ *Aristotle Unified Communications, Inc., Application for Designation as an Eligible Telecommunications Carrier for Purpose of Receiving Federal Universal Service Support for the Purpose of Receiving Support from the FCC Connect America Fund Phase II*, Docket No. 2018-UA-224, Order (Feb. 5, 2019), at 6 (¶ 17) (finding that, in light of the FCC’s build-out plan requirements, “AUC is entitled to a waiver”).

Based on the FCC's RDOF Phase I build-out and reporting requirements, and the Commission's decision in the AUC proceeding, PRVC requests that the Commission waive the requirement of ETC Checklist Section I.A.1.c., relating to the submission of a five-year improvements and upgrades plan. If the waiver is granted, then the Company will make available to the Commission all reports it is required to file with the FCC in connection with the funding awarded in the RDOF Phase I auction.

VIII. CONCLUSION.

For all of the foregoing reasons, PRVC LLC respectfully requests that the Commission designate PRVC as both a high-cost and low-income Eligible Telecommunications Carrier, so that PRVC will be eligible to receive the Rural Digital Opportunity Fund Phase I support it has been awarded in Auction 904, as well as federal Lifeline support, throughout its proposed ETC designation area.

Respectfully submitted,



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P.O. Drawer 948
Columbia, MS 39429
E-mail: lhahn@mcneesehahn.com

January 6, 2021

VERIFICATION

STATE OF MISSISSIPPI)
)
COUNTY OF MARION)

I, Matthew Ware, President of Pearl River Valley Communications, LLC, state that I am the President of Pearl River Valley Communications, LLC; that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge, and belief; and that I am authorized to make this statement on behalf of Pearl River Valley Communications, LLC.

A handwritten signature in black ink, appearing to read 'Matthew Ware', is written over a horizontal line.

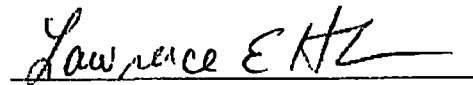
Matthew Ware
President
Pearl River Valley Communications, LLC

CERTIFICATE OF SERVICE

I, Lawrence E. Hahn, an attorney for Pearl River Valley Communications, LLC ("Applicant"), do hereby certify that I have filed the foregoing Application for Designation as an Eligible Telecommunications Carrier electronically with the Commission in accordance with the guidance letter sent to the Electric Cooperatives of Mississippi by Ms. Katherine Collier, Executive Director, Acting General Counsel, on December 21, 2020, and that, in filing the Application, I have complied with the service requirements of the Commission's Eligible Telecommunications Carrier Checklist ("ETC Checklist").

I, Lawrence E. Hahn, do also certify in accordance with Section I.C.1. of the ETC Checklist that I have, as an attorney for Applicant, caused to be served concurrently with the filing of this Application, by United States Mail, postage pre-paid, a Notice of the Application, in substantially the same form as included in Exhibit C of this Application, to eligible telecommunications carriers and incumbent local exchange carriers in the State of Mississippi, as listed in Exhibit C, in satisfaction of the Commission's requirements.

This, the 6th day of January, 2021

A handwritten signature in black ink, appearing to read "Lawrence E. Hahn", written over a horizontal line.

Lawrence E. Hahn, MSB No. 8954
McNeese & Hahn, PLLC
338 Church Street
P.O. Drawer 948
Columbia, MS 39429
E-mail: lhahn@mcneesehahn.com
Mississippi State Bar No. 8954

EXHIBIT A2

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

280319504003035	280350105002087	280350105002195	280350106002020
280319504003036	280350105002096	280350105002196	280350106002023
280319504003049	280350105002107	280350105002206	280350106002031
280319504003050	280350105002108	280350105002217	280350106002032
280319504003053	280350105002109	280350105003063	280350106002061
280319504003056	280350105002111	280350105003088	280350106002070
280319504003057	280350105002112	280350105003090	280350106002075
280319504003059	280350105002115	280350105003091	280350106002082
280319504003060	280350105002119	280350105003095	280350106002083
280319504003064	280350105002120	280350106001006	280350106002109
280319504003065	280350105002121	280350106001008	280350106002112
280319504003066	280350105002122	280350106001015	280350106002127
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280319504003070	280350105002125	280350106001040	280350106002141
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280350105002001	280350105002143	280350106001179	280350106002191
280350105002002	280350105002144	280350106001370	280350106002192
280350105002016	280350105002146	280350106001387	280350106002193
280350105002017	280350105002147	280350106001389	280350106002194
280350105002018	280350105002148	280350106001400	280350106002197
280350105002021	280350105002149	280350106001493	280350106002204
280350105002024	280350105002151	280350106001546	280350106002210
280350105002025	280350105002152	280350106001578	280350106002212
280350105002027	280350105002153	280350106001585	280350106002213
280350105002030	280350105002155	280350106001586	280350106002217
280350105002031	280350105002156	280350106001587	280350106002227
280350105002032	280350105002157	280350106001588	280350106002234
280350105002033	280350105002158	280350106001596	280350106002235
280350105002044	280350105002163	280350106001612	280350106002238
280350105002052	280350105002164	280350106001614	280350106002243
280350105002062	280350105002165	280350106001621	280350106002248
280350105002077	280350105002172	280350106002000	280350106002249
280350105002083	280350105002174	280350106002002	280350106002250
280350105002084	280350105002184	280350106002012	280350106002256
280350105002086	280350105002194	280350106002014	280350106002265

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280350106002269	280350106004017	280350106004198	280350106005080
280350106003002	280350106004018	280350106004201	280350106005083
280350106003008	280350106004019	280350106004204	280350106005084
280350106003011	280350106004020	280350106004208	280350106005085
280350106003012	280350106004024	280350106004216	280350106005089
280350106003018	280350106004025	280350106004221	280350106005094
280350106003020	280350106004026	280350106004222	280350106005097
280350106003027	280350106004028	280350106004229	280399503014127
280350106003028	280350106004029	280350106005000	280399503014131
280350106003032	280350106004034	280350106005003	280399503014134
280350106003040	280350106004035	280350106005006	280399503014135
280350106003041	280350106004036	280350106005010	280399503014137
280350106003042	280350106004048	280350106005013	280399503014138
280350106003043	280350106004049	280350106005017	280399503014170
280350106003045	280350106004050	280350106005019	280399503014172
280350106003048	280350106004051	280350106005020	280399503014173
280350106003050	280350106004055	280350106005022	280399503014174
280350106003052	280350106004057	280350106005023	280399503014175
280350106003053	280350106004058	280350106005024	280399503014176
280350106003054	280350106004088	280350106005028	280590402014011
280350106003056	280350106004090	280350106005030	280590402014056
280350106003058	280350106004094	280350106005031	280590402014057
280350106003061	280350106004096	280350106005032	280590402014058
280350106003063	280350106004104	280350106005033	280659502011033
280350106003067	280350106004110	280350106005035	280659502011034
280350106003068	280350106004114	280350106005036	280659502011043
280350106003070	280350106004115	280350106005038	280659502011046
280350106003072	280350106004116	280350106005041	280659502011061
280350106003078	280350106004128	280350106005043	280659502011062
280350106003084	280350106004129	280350106005044	280659502011063
280350106003094	280350106004132	280350106005046	280659502011064
280350106003096	280350106004134	280350106005047	280659502011065
280350106003100	280350106004160	280350106005051	280659502011067
280350106003101	280350106004173	280350106005052	280659502011078
280350106003102	280350106004176	280350106005057	280659502011085
280350106003109	280350106004184	280350106005059	280659502011086
280350106003116	280350106004185	280350106005063	280659502012053
280350106003120	280350106004186	280350106005068	280659502012055
280350106003125	280350106004190	280350106005070	280659502012064
280350106004007	280350106004195	280350106005072	280659502012069
280350106004010	280350106004196	280350106005074	280659502012075
280350106004016	280350106004197	280350106005077	280659502012076

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280659502012079	280659502022117	280659502022179	280730201002057
280659502021029	280659502022118	280659502022180	280730201003002
280659502021036	280659502022120	280659502022181	280730201003010
280659502021041	280659502022121	280659502022182	280730201003026
280659502021042	280659502022122	280659502022188	280730201003028
280659502021043	280659502022123	280659502023028	280730201003030
280659502021045	280659502022124	280659502023031	280730201003033
280659502021051	280659502022125	280659502023033	280730201003035
280659502021053	280659502022127	280659502023034	280730201003036
280659502021056	280659502022129	280659502023038	280730201003042
280659502022018	280659502022130	280730201001003	280730201003045
280659502022033	280659502022131	280730201001005	280730201003069
280659502022050	280659502022132	280730201001012	280730201004008
280659502022053	280659502022134	280730201001014	280730201004010
280659502022057	280659502022135	280730201001015	280730201004012
280659502022058	280659502022136	280730201001016	280730201004016
280659502022059	280659502022137	280730201001053	280730201004028
280659502022061	280659502022142	280730201001054	280730201004038
280659502022063	280659502022143	280730201001055	280730201004044
280659502022066	280659502022144	280730201001057	280730201004054
280659502022069	280659502022147	280730201001058	280730201004061
280659502022071	280659502022150	280730201001059	280730201004064
280659502022072	280659502022152	280730201001060	280730201004065
280659502022074	280659502022153	280730201001061	280730201004097
280659502022079	280659502022154	280730201001071	280730201004099
280659502022083	280659502022155	280730201001072	280730201004101
280659502022094	280659502022157	280730201001073	280730201004102
280659502022095	280659502022158	280730201001074	280730201004106
280659502022097	280659502022159	280730201001075	280730201004117
280659502022098	280659502022160	280730201001076	280730201004119
280659502022099	280659502022162	280730201001077	280730201004120
280659502022100	280659502022164	280730201001079	280730201004121
280659502022102	280659502022165	280730201001080	280730201004122
280659502022103	280659502022166	280730201001082	280730201004123
280659502022105	280659502022168	280730201001083	280730201004124
280659502022106	280659502022169	280730201001086	280730201004127
280659502022107	280659502022170	280730201001087	280730201004129
280659502022108	280659502022171	280730201002034	280730201004130
280659502022109	280659502022172	280730201002040	280730201004132
280659502022111	280659502022173	280730201002043	280730201004133
280659502022112	280659502022175	280730201002053	280730201004136
280659502022114	280659502022177	280730201002055	280730201004137

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280730202011000	280730202012019	280730202021015	280730202023011
280730202011001	280730202012021	280730202021016	280730202023012
280730202011003	280730202012022	280730202022004	280730202023013
280730202011004	280730202012023	280730202022006	280730202023014
280730202011005	280730202012024	280730202022007	280730202023015
280730202011006	280730202012026	280730202022009	280730202023016
280730202011008	280730202012027	280730202022010	280730202023017
280730202011009	280730202012029	280730202022013	280730202023019
280730202011010	280730202012030	280730202022015	280730202023020
280730202011012	280730202012031	280730202022016	280730202023021
280730202011014	280730202012032	280730202022020	280730202023022
280730202011015	280730202012033	280730202022021	280730202023024
280730202011016	280730202012034	280730202022024	280730202023025
280730202011017	280730202012035	280730202022025	280730202023026
280730202011018	280730202012037	280730202022027	280730202023027
280730202011019	280730202012043	280730202022032	280730202023028
280730202011021	280730202012044	280730202022033	280730202023029
280730202011023	280730202012045	280730202022034	280730202023030
280730202011024	280730202012046	280730202022035	280730202023031
280730202011025	280730202012047	280730202022037	280730202023033
280730202011026	280730202012048	280730202022039	280730202023035
280730202011027	280730202012049	280730202022040	280730202023036
280730202011029	280730202012050	280730202022041	280730202023037
280730202011031	280730202012051	280730202022044	280730202023038
280730202011033	280730202012052	280730202022045	280730202023040
280730202011034	280730202012054	280730202022046	280730202023042
280730202011035	280730202012056	280730202022047	280730202023043
280730202012000	280730202012057	280730202022049	280730202023044
280730202012001	280730202021000	280730202022050	280730202023045
280730202012002	280730202021002	280730202022051	280730202023049
280730202012003	280730202021003	280730202022053	280730202023052
280730202012004	280730202021004	280730202022054	280730202023053
280730202012005	280730202021005	280730202023000	280730202023054
280730202012006	280730202021006	280730202023001	280730202023056
280730202012007	280730202021007	280730202023002	280730202023062
280730202012008	280730202021008	280730202023003	280730202023063
280730202012009	280730202021009	280730202023004	280730202023064
280730202012010	280730202021010	280730202023005	280730202023065
280730202012011	280730202021011	280730202023006	280730202023066
280730202012012	280730202021012	280730202023008	280730202023067
280730202012015	280730202021013	280730202023009	280730202023068
280730202012016	280730202021014	280730202023010	280730202023071

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280730202023072	280730203011032	280730203014021	280730203022028
280730202023073	280730203011033	280730203014027	280730203022029
280730202023075	280730203011034	280730203014031	280730203022030
280730202023077	280730203011035	280730203014033	280730203022033
280730202023083	280730203011037	280730203021005	280730203022034
280730202023085	280730203011038	280730203021007	280730203022035
280730202023086	280730203011045	280730203021008	280730203022036
280730202023089	280730203011048	280730203021009	280730203022042
280730202023090	280730203011049	280730203021010	280730203022045
280730202023092	280730203011050	280730203021011	280730203022046
280730202023093	280730203011051	280730203021012	280730203022047
280730202023094	280730203011052	280730203021015	280730203022049
280730202023095	280730203011053	280730203021016	280730203022051
280730202023096	280730203011057	280730203021017	280730203022053
280730202023097	280730203011058	280730203021019	280730203022054
280730202023098	280730203011059	280730203021020	280730203022056
280730202023099	280730203011061	280730203021022	280730203022057
280730202023101	280730203011063	280730203021023	280730203022058
280730203011000	280730203011064	280730203021024	280730203022059
280730203011001	280730203011066	280730203021027	280730203022060
280730203011002	280730203011068	280730203021028	280730203022061
280730203011003	280730203011069	280730203021029	280730203022062
280730203011004	280730203011075	280730203021031	280730203022063
280730203011005	280730203011078	280730203021032	280730203022064
280730203011006	280730203011079	280730203021034	280730203022066
280730203011007	280730203011080	280730203021035	280730203022067
280730203011008	280730203011081	280730203021036	280730203022068
280730203011009	280730203013020	280730203021037	280730203022069
280730203011013	280730203013021	280730203021038	280730203022070
280730203011015	280730203013022	280730203021039	280730203022072
280730203011016	280730203014000	280730203022008	280730203022073
280730203011018	280730203014001	280730203022009	280730203022074
280730203011019	280730203014003	280730203022011	280730203022075
280730203011021	280730203014004	280730203022017	280730203022076
280730203011022	280730203014008	280730203022019	280730203022077
280730203011023	280730203014011	280730203022020	280730203022078
280730203011025	280730203014012	280730203022022	280730203022079
280730203011026	280730203014013	280730203022023	280730203022081
280730203011027	280730203014014	280730203022024	280730203022082
280730203011029	280730203014017	280730203022025	280730203022083
280730203011030	280730203014019	280730203022026	280730203022085
280730203011031	280730203014020	280730203022027	280730203022089

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280730203022090	280730204001060	280730204004006	280730205001025
280730203022091	280730204001062	280730204004009	280730205001031
280730203023042	280730204001063	280730204004025	280730205001036
280730203023044	280730204001064	280730204004029	280730205001041
280730203023046	280730204001065	280730204004031	280730205001042
280730203023048	280730204001067	280730204004032	280730205001050
280730203023049	280730204001069	280730204004033	280730205001054
280730203023050	280730204001070	280730204004035	280730205001056
280730203023051	280730204001071	280730204004042	280730205001057
280730203023053	280730204002004	280730204004043	280730205001058
280730203023055	280730204002010	280730204004044	280730205001084
280730203023056	280730204002011	280730204005020	280730205001086
280730203023057	280730204002012	280730204005023	280730205001088
280730203023058	280730204002013	280730204005024	280730205001089
280730203023059	280730204002014	280730204005025	280730205001090
280730203023060	280730204002015	280730204005026	280730205001091
280730203023063	280730204002017	280730204005027	280730205001092
280730203023064	280730204002019	280730204005028	280730205001093
280730203023065	280730204002020	280730204005031	280730205001094
280730203023067	280730204002022	280730204005033	280730205001095
280730203023068	280730204002023	280730204005035	280730205001097
280730204001000	280730204002024	280730204005037	280730205001098
280730204001011	280730204002025	280730204005052	280730205001099
280730204001013	280730204002026	280730204005053	280730205001104
280730204001014	280730204002029	280730204005055	280730205002002
280730204001015	280730204002030	280730204005056	280730205002003
280730204001016	280730204002032	280730204005059	280730205002009
280730204001017	280730204002033	280730204005060	280730205002032
280730204001020	280730204002035	280730205001001	280730205002033
280730204001021	280730204002036	280730205001002	280730205002035
280730204001023	280730204002042	280730205001004	280730205002040
280730204001025	280730204002043	280730205001005	280730205002074
280730204001026	280730204002044	280730205001007	280730205002076
280730204001027	280730204002045	280730205001008	280730205002077
280730204001028	280730204002046	280730205001009	280730205002079
280730204001029	280730204003004	280730205001010	280730205002085
280730204001031	280730204003005	280730205001011	280730205002087
280730204001032	280730204003015	280730205001014	280730205002096
280730204001035	280730204003036	280730205001018	280730205002098
280730204001037	280730204004000	280730205001019	280730205002110
280730204001038	280730204004001	280730205001020	280730205002111
280730204001058	280730204004005	280730205001021	280730205002116

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280730205002117	280730206001090	280730206003060	280779603003045
280730205002118	280730206001092	280730206003062	280779603003046
280730205002120	280730206001093	280730206003063	280779603003048
280730205002131	280730206001097	280730206003067	280779603003049
280730205002135	280730206001099	280779601002002	280779603003050
280730205002146	280730206001102	280779601002007	280779603003051
280730205003036	280730206002000	280779601002008	280779603003052
280730205003055	280730206002001	280779601002009	280779603003066
280730205003056	280730206002002	280779601002015	280779603003067
280730205003066	280730206002003	280779601002016	280779603003069
280730205003082	280730206002004	280779601002017	280919501001009
280730205003092	280730206002005	280779601002018	280919501001030
280730205003093	280730206002007	280779601002019	280919501001031
280730206001000	280730206002008	280779601002020	280919501001036
280730206001001	280730206002009	280779601002021	280919501001050
280730206001004	280730206002010	280779601002022	280919501001055
280730206001009	280730206002011	280779601002023	280919501002004
280730206001011	280730206002012	280779601002024	280919501002021
280730206001012	280730206002013	280779601002025	280919501002025
280730206001013	280730206002014	280779601002026	280919501002028
280730206001015	280730206002015	280779601002028	280919501002032
280730206001016	280730206002017	280779601002031	280919501002044
280730206001018	280730206002019	280779601002032	280919501002052
280730206001019	280730206002020	280779601002033	280919501003045
280730206001022	280730206002021	280779601002034	280919501003049
280730206001023	280730206002023	280779601002035	280919501003055
280730206001024	280730206002026	280779601002036	280919501003073
280730206001025	280730206002031	280779601002037	280919501003083
280730206001026	280730206002032	280779601002040	280919501003095
280730206001030	280730206003010	280779601004036	280919501004023
280730206001032	280730206003011	280779603003007	280919501004032
280730206001034	280730206003012	280779603003008	280919501004034
280730206001035	280730206003017	280779603003016	280919501004036
280730206001036	280730206003020	280779603003017	280919501004045
280730206001037	280730206003021	280779603003025	280919501004047
280730206001040	280730206003023	280779603003035	280919501004048
280730206001041	280730206003024	280779603003036	280919501004054
280730206001042	280730206003025	280779603003037	280919501004058
280730206001044	280730206003031	280779603003039	280919501004059
280730206001045	280730206003034	280779603003040	280919501004061
280730206001087	280730206003035	280779603003041	280919501004064
280730206001088	280730206003057	280779603003043	280919501004065

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280919501004070	280919502002062	280919504003085	280919505002043
280919501004073	280919502002064	280919504003087	280919505002044
280919501004074	280919502002074	280919504003088	280919505002045
280919501004079	280919502002076	280919504004073	280919505002046
280919501004080	280919502002081	280919504004080	280919505002047
280919501004082	280919502002086	280919505001000	280919505002048
280919501005005	280919502002088	280919505001001	280919505002049
280919501005037	280919502002094	280919505001002	280919505002050
280919501005038	280919502002095	280919505001003	280919505002051
280919501005057	280919503001001	280919505001004	280919505002052
280919501005061	280919503001002	280919505001005	280919505002053
280919501005063	280919503001003	280919505001006	280919505002055
280919501005064	280919503001005	280919505001007	280919505002056
280919501005068	280919503001006	280919505001018	280919505002057
280919501005072	280919503001007	280919505001019	280919505002058
280919501005073	280919503001009	280919505001023	280919505002061
280919501005074	280919503002007	280919505001028	280919505002066
280919501005079	280919503003000	280919505001029	280919505002068
280919501005080	280919503003001	280919505001031	280919505002070
280919501005081	280919503003002	280919505001035	280919505002072
280919501005082	280919503003019	280919505001042	280919505002073
280919501005084	280919504001000	280919505001086	280919505002074
280919501005085	280919504001007	280919505002000	280919505002075
280919501005090	280919504001009	280919505002001	280919505002076
280919502001013	280919504001010	280919505002002	280919505002077
280919502001017	280919504001013	280919505002003	280919505002078
280919502001018	280919504001014	280919505002005	280919505002080
280919502001022	280919504001015	280919505002006	280919505002081
280919502001034	280919504001016	280919505002007	280919505002082
280919502001035	280919504001017	280919505002008	280919505002086
280919502001036	280919504001018	280919505002010	280919505002087
280919502001039	280919504001021	280919505002011	280919505002088
280919502001041	280919504001037	280919505002012	280919505003014
280919502001050	280919504001038	280919505002014	280919505003033
280919502001088	280919504002000	280919505002015	280919505003041
280919502001089	280919504002001	280919505002026	280919505003045
280919502001093	280919504002003	280919505002033	280919505003046
280919502001094	280919504002005	280919505002034	280919505003047
280919502001105	280919504002009	280919505002038	280919506001002
280919502002032	280919504003074	280919505002039	280919506001003
280919502002045	280919504003080	280919505002041	280919506001004
280919502002060	280919504003084	280919505002042	280919506001007

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280919506001013	281099501001047	281099501004002	281119502002123
280919506001018	281099501001049	281099501004003	281119502002124
280919506001028	281099501001055	281099501004004	281119502002128
280919506001034	281099501001057	281099501004011	281119502002132
280919506001037	281099501001062	281099501004012	281119502002133
280919506001041	281099501001071	281099501004014	281119502002138
280919506001051	281099501001073	281099501004016	281119502002162
280919506001053	281099501001082	281099501004017	281119502002169
280919506001054	281099501001120	281099501004019	281119502002170
280919506001055	281099501001127	281099501004020	281119502002208
280919506001056	281099501001142	281099501004021	281119502002209
280919506002000	281099501001150	281099501004022	281119502002210
280919506002001	281099501001159	281099501004024	281119502002211
280919506002002	281099501001164	281099501004026	281119502002212
280919506002005	281099501001170	281099501004027	281119502002213
280919506002009	281099501001174	281099501004029	281119502002216
280919506002010	281099501001180	281099501004030	281119502002218
280919506002015	281099501001184	281099501004031	281119502002219
280919506002017	281099501003012	281099501004033	281119502002220
280919506002018	281099501003013	281099501004034	281119502002223
280919506002019	281099501003014	281099501004035	281119502002224
280919506002020	281099501003019	281099501004036	281119502002225
280919506002023	281099501003020	281099501004037	281119502002226
280919506002032	281099501003030	281099501004043	281119502002227
280919506002035	281099501003032	281099501004063	281119502002228
280919506002039	281099501003035	281099502002000	281119502002231
280919506003004	281099501003036	281099502002001	281119502002232
280919506003012	281099501003038	281099502002002	281119502002233
280919506003017	281099501003045	281099502002004	281119502002234
280919506003018	281099501003051	281099502002005	281119502002235
280919506003021	281099501003052	281099502002008	281119502002236
280919506003022	281099501003054	281099502002009	281119502002239
280919506003025	281099501003055	281099502002012	281119502002241
280919506003027	281099501003063	281099502002094	281119502002242
280919506003043	281099501003086	281099502002095	281119502002247
280919506003048	281099501003087	281099502002097	281119502002248
280919506004004	281099501003088	281099502002099	281119502002249
280919506004007	281099501003092	281099502003000	281119502002250
280919506004021	281099501003093	281099502003001	281119502002252
280919506004025	281099501003094	281099502003002	281119502002253
281099501001032	281099501004000	281099502003004	281119502002254
281099501001045	281099501004001	281099502003006	281119502002255

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281119502002256	281310201001015	281310202011136	281310202012061
281119502002257	281310201001027	281310202011137	281310202012069
281119502002260	281310201001103	281310202011139	281310202012084
281119502002262	281310201002027	281310202011140	281310202012085
281119502002264	281310201002035	281310202011141	281310202012087
281119502002265	281310201002037	281310202011149	281310202012091
281119502002272	281310201002055	281310202011150	281310202012096
281119502002273	281310201002058	281310202011152	281310202012098
281119502002274	281310201002059	281310202011154	281310202012109
281119502002276	281310201003041	281310202011158	281310202012110
281119502002287	281310201003050	281310202011160	281310202012111
281119502002288	281310201003051	281310202011161	281310202012117
281119502002289	281310201003052	281310202011163	281310202012118
281119502002291	281310201003059	281310202011164	281310202012121
281119502002293	281310201003060	281310202011166	281310202012123
281119502002295	281310201003064	281310202011167	281310202012128
281119502002300	281310201003066	281310202011169	281310202012132
281119502002302	281310201003067	281310202011170	281310202012133
281119502002305	281310202011012	281310202012003	281310202012137
281119502002306	281310202011016	281310202012004	281310202012149
281119502002307	281310202011021	281310202012007	281310202012151
281119502002310	281310202011025	281310202012011	281310202012154
281119502002311	281310202011026	281310202012012	281310202012161
281119502002312	281310202011032	281310202012014	281310202012172
281119502002317	281310202011063	281310202012015	281310202012182
281119502002318	281310202011067	281310202012017	281310202012183
281119502002321	281310202011068	281310202012018	281310202012190
281119502002323	281310202011070	281310202012023	281310202012191
281119502002324	281310202011081	281310202012025	281310202012195
281119502002326	281310202011084	281310202012026	281310202012208
281119502002327	281310202011086	281310202012027	281310202012209
281119502002329	281310202011088	281310202012030	281310202012213
281119502002331	281310202011089	281310202012032	281310202012218
281119502002333	281310202011096	281310202012033	281310202012227
281119502002334	281310202011099	281310202012034	281310202012230
281119502002335	281310202011105	281310202012035	281310202012231
281119502002337	281310202011110	281310202012036	281310202012238
281119502002339	281310202011125	281310202012038	281310202012240
281119502002340	281310202011128	281310202012044	281310202012255
281119502002341	281310202011129	281310202012047	281310202012257
281119502002351	281310202011131	281310202012057	281310202013017
281310201001005	281310202011133	281310202012058	281310202013019

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281310202013020	281310202021066	281310202022028	281310202023063
281310202013023	281310202021068	281310202022031	281310202023075
281310202013025	281310202021071	281310202022034	281310202023078
281310202013026	281310202021073	281310202022035	281310202023080
281310202013027	281310202021074	281310202022036	281310202023082
281310202013031	281310202021075	281310202022044	281310202023086
281310202013032	281310202021078	281310202022050	281310202023088
281310202013040	281310202021080	281310202022051	281310202023089
281310202013041	281310202021081	281310202022053	281310202023090
281310202013043	281310202021082	281310202022054	281310202023091
281310202013044	281310202021083	281310202022055	281310202023092
281310202013046	281310202021085	281310202022058	281310202023097
281310202013049	281310202021086	281310202022059	281310202023104
281310202013051	281310202021093	281310202022063	281310202023106
281310202013065	281310202021094	281310202022074	281310202023108
281310202013074	281310202021096	281310202022075	281310202023109
281310202013075	281310202021101	281310202022077	281310202023110
281310202013078	281310202021103	281310202022083	281310202023111
281310202013079	281310202021107	281310202022084	281310202023113
281310202013080	281310202021129	281310202022087	281310202023115
281310202013082	281310202021135	281310202022104	281310202023116
281310202013083	281310202021140	281310202022115	281310202023117
281310202013094	281310202021156	281310202022125	281310202023118
281310202013100	281310202021189	281310202022132	281310202023119
281310202013102	281310202021222	281310202022140	281310202023121
281310202013103	281310202021233	281310202023000	281310202023122
281310202013104	281310202021239	281310202023009	281310202023123
281310202013105	281310202021250	281310202023014	281310202023125
281310202013106	281310202021269	281310202023017	281310202023126
281310202013115	281310202022003	281310202023018	281479501001000
281310202021018	281310202022005	281310202023019	281479501001001
281310202021020	281310202022006	281310202023020	281479501001003
281310202021024	281310202022007	281310202023023	281479501001033
281310202021025	281310202022008	281310202023024	281479501001043
281310202021032	281310202022009	281310202023038	281479501001049
281310202021035	281310202022013	281310202023046	281479501001064
281310202021043	281310202022014	281310202023053	281479501001065
281310202021046	281310202022015	281310202023055	281479501001067
281310202021048	281310202022017	281310202023056	281479501001068
281310202021060	281310202022019	281310202023057	281479501006015
281310202021063	281310202022024	281310202023058	281479501006016
281310202021065	281310202022027	281310202023062	281479501006017

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281479503003001
281479503003002
281479503003004

281479503004000
281479503004003
281479503004086

281479503005000
281479503005018
281479503005071

281479503005077
281479503005079

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