

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF)	
JASPER COUNTY RURAL ELECTRIC)	
MEMBERSHIP CORPORATION FOR)	
DESIGNATION AS AN ELIGIBLE)	CAUSE NO. 41052 – ETC - 89
TELECOMMUNICATIONS CARRIER FOR)	
THE PURPOSE OF RECEIVING RURAL)	
DIGITAL OPPORTUNITY FUND PHASE I)	
SUPPORT)	

**VERIFIED PETITION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATION CARRIER FOR THE PURPOSE OF
RECEIVING RURAL DIGITAL OPPORTUNITY FUND PHASE I SUPPORT**

Jasper County Rural Electric Membership Corporation (“Jasper County REMC”, “REMC”, or “Petitioner”), pursuant to Section 214(e)(2) of the Federal Communications Act of 1934 (the “Act”), as codified at 47 USC § 214(e), and Section 54.201 of the Rules of the Federal Communications Commission (“FCC”), hereby petitions and requests the Indiana Utility Regulatory Commission (“Commission”) to issue an order designating REMC as an eligible telecommunications carrier (“ETC”) to become authorized to receive support from the Rural Digital Opportunity Fund (“RDOF”) Phase I. As demonstrated herein, REMC meets all statutory and regulatory requirements for designation as an ETC in the state of Indiana.

Additionally, REMC respectfully requests that the Commission grant this Petition expeditiously on or before June 2, 2021 to ensure that REMC remains eligible to obtain the RDOF support necessary to expand its high-speed broadband and voice services for unserved rural Indiana residents. In support of this petition, REMC states the following:

I. BACKGROUND

A. Company Overview

REMC is an Indiana rural electric membership corporation organized under Ind. Code §

8-1-13-1 *et seq.* and registered with the Indiana Secretary of State with its principle place of business located at 280 E Wood Rd, Rensselaer IN 47978. REMC has traditionally provided electric utility service within counties in Indiana, including Jasper, Newton, Porter, Pulaski, Starke, and White. REMC holds a Certificate of Public Convenience and Necessity issued on April 21, 1938 in Cause No. 13110.

On January 14, 2010, REMC filed a Notice of Change Form with the Indiana Utility Regulatory Commission to being providing Satellite Internet Services to its members. On November 30, 2020, REMC filed a second Notice of Change Form as amended on January 5, 2021, to include fixed wireless and fiber-based broadband service and interconnected VoIP service.

B. Rural Digital Opportunity Fund Phase I

In 2011, the FCC reformed the Universal Service Fund and intercarrier compensation regime to support deployment of broadband infrastructure. In 2015, the FCC offered incumbent carriers fixed support to deploy broadband infrastructure based on the Connect America Cost Model (“CAM”). Approximately \$1.488 billion of additional support was allocated through the subsequent Connect America Fund (“CAF”) Phase II reverse auction conducted in 2018.¹

On August 2, 2019, the FCC proposed the Rural Digital Opportunity Fund (“RDOF”) to provide an additional \$20.4 billion in support through another reverse auction to bring broadband service to areas that lack access to both fixed voice and 25/3 Mbps broadband

¹ See generally *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949 (2016) (*CAF Phase II Auction Order and/or FNPRM*); *Connect America Fund Phase II Auction Scheduled for July 24, 2018; Notice and Filing Requirements and Other Procedures for Auction 903*, Public Notice, AU Docket No. 17-182, WC Docket No. 10-90, 33 FCC Rcd 1428 (2018) (*Auction 903 Procedures Public Notice*); *Connect America Fund Phase II Auction (Auction 903) Closes; Winning Bidders Announced; FCC Form 683 Due October 15, 2018*, AU Docket No. 17-182, WC Docket No. 10-90, Public Notice, 33 FCC Rcd 8257 (WTB and WCB 2018) (*Auction 903 Closing Public Notice*).

services.² The minimum supported speed under RDOF is 25/3 Mbps, but the auction rules give priority to faster broadband speeds of up to a gigabit per second and lower latency service. RDOF Phase I support recipients must offer the required voice and broadband service to *all* eligible homes and small businesses within the awarded areas. RDOF Phase I support will be disbursed over a 10-year period. While RDOF Phase I targeted census block groups that are *wholly* unserved with broadband at speeds of 25/3 Mbps, the FCC reserved some of the funding for Phase II, which will target census block groups that are only partially served, as well as census block groups unawarded in the Phase I auction.³

Following the procedure established in the *Auction 904 Notice*,⁴ REMC submitted its FCC Form 183 short-form application prior to the July 15, 2020 deadline. This application provided identification, operations and financial information of REMC and described REMC's proposed networks using RDOF Phase I funding. In its application, REMC acknowledged that it must be designated as an ETC in the areas in which it would receive RDOF Phase I support prior to being authorized to receiving such support. Based upon REMC's Form 183 application, the FCC determined that REMC met legal, technical and financial qualifications to participate in Auction 904 and to meet the service requirements associated with the performance tier and latency combination(s) on which it bid during Auction 904.

REMC participated in Auction 904, which was a multi-round, descending-clock auction designed to select bids from providers that would deploy high-speed broadband and voice

² *In the Matter of Rural Digital Opportunity Fund et al., Notice of Proposed Rulemaking*, 34 FCC Rcd 6778 (August 1, 2019) (“*Rural Digital Opportunity Fund NOPR*”)

³ *In the Matter of Rural Digital Opportunity Fund et al., Report and Order*, 35 FCC Rcd 686 (January 20, 2020) (“*Rural Digital Opportunity Fund Order*”)

⁴ *In the Matter of Rural Digital Opportunity Fund et al., Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, 35 FCC Rcd 6077 (June 11, 2020) (“*Auction 904 Notice*”).

services in unserved communities.⁵ On December 7, 2020 the FCC announced the winning bidders of Auction 904, including REMC, which was awarded \$281,147 in RDOF Phase I funding over ten (10) years to deploy service to 262 locations.⁶ Following the award of support, REMC must submit its FCC Form 683 long-form post-auction application for support in order to become authorized by the FCC to receive the support it had been awarded during Auction 904.⁷ REMC will submit its FCC Form 683 application by the January 29, 2021 deadline. As part of the long-form application, REMC will acknowledge that it must be designated by the Commission as an ETC for all of the eligible census block groups covered by its winning bid. REMC has 180 days from the release of the Auction 904 closing public notice (until June 7, 2021) to obtain ETC designation in all areas for which it will receive RDOF Phase I support and to provide documentation of the same to the FCC.⁸ REMC will not be authorized to receive RDOF Phase I support, nor will any such support be released to REMC, if it does not obtain the appropriate ETC designation.

Therefore, in order to fulfil its post-auction obligations for receipt of RDOF Phase I support, REMC respectfully submits this Verified Petition for designation as an ETC in the census block groups identified on **Exhibit A** attached hereto.

⁵ *In the Matter of Rural Digital Opportunity Fund et al., Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, 35 FCC Rcd 6077 (June 11, 2020) (“Auction 904 Notice”).

⁶ *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021*, FCC AU Docket No. 20-34, WC Docket No. 10-90 (December 7, 2020) (“Public Notice of Winning Bidders”).

⁷ *Public Notice of Winning Bidders*, FCC AU Docket No. 20-34, WC Docket No. 10-90.

⁸ *In the Matter of Rural Digital Opportunity Fund et al., Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, 35 FCC Rcd 6077 (June 11, 2020) (“Auction 904 Notice”). The FCC indicated that if a long-form applicant is unable to obtain the necessary ETC designations within the 180 day timeframe, it would be appropriate to waive the 180-day timeframe if the long-form applicant is able to demonstrate that it has engaged in good faith efforts to obtain an ETC designation, but the proceeding is not yet complete. The FCC will presume that a long-form applicant acted in good faith if it files its ETC application with the state commission within 30 days of the release of the Auction 904 closing public notice.

II. COMMISSION JURISDICTION

Section 214(e)(2) of the Act gives a state public utility commission the responsibility to designate ETCs within its state for service areas designed by the state commission.⁹ Further, Ind. Code § 8-1-2.6-13 authorizes the Commission to fulfill its obligations under the Act concerning designation of ETCs.¹⁰ Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier. As such, the Commission has authority to designate REMC as an ETC within the service areas for which REMC has been awarded RDOF Phase I funding. Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC if the carrier satisfies the requirements of Section 214(e)(1).¹¹

III. PETITIONER SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC.

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under Section 214(e) of this title shall be eligible to receive specific federal universal support.”¹² Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s Rules provide that ETC applicants must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s facilities.¹³ Applications must also commit to advertise the availability and rates of such service.¹⁴ As set forth below, REMC will satisfy each of these requirements.

A. Petitioner will be a Common Carrier as Required by 47 CFR § 54.201.

⁹ 47 USC § 214(e)(2).

¹⁰ IND. CODE § 8-1-2.6-13.

¹¹ 47 USC § 214(e)(2).

¹² 47 USC § 254(e)

¹³ 47 USC § 214(e)(1) and 47 CFR § 54.201(d).

¹⁴ *Id.*

“The term ‘common carrier’ or ‘carrier’ means 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. . . .”¹⁵ Petitioner will offer communication services for sale to the public by wire and radio and will transmit communications both interstate and intrastate, making it a “common carrier” for purposes for being designated as an ETC and receiving universal service support.

B. Petitioner Will Provide All Required Services Through a Combinations of Its Own Facilities and Resale Consistent with 47 USC § 214(e)(1)(A), 47 CFR § 54.201(d)(1) and 47 CFR § 54.101.

Consistent with the requirements of Section 214(e)(1) of the Act and sections 54.101 through 54.207 of the FCC Rules, REMC will provide all services required in order to be eligible for high-cost universal service support in the state of Indiana using its own facilities and, if necessary, through resale of another carrier’s services, allowing it to meet the FCC’s requirement that an ETC provide certain voice telephony services that are supported by federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier’s services.¹⁶ The voice telephony services required to be provided by REMC in the designated service areas include 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 emergency services provided by local government or other public safety organizations, and toll limitation services to qualifying low-income consumers.¹⁷ The broadband access services required to be provided by REMC in the designated service areas include the capability to transmit data to and receive data by wire or

¹⁵ 47 USC § 153(11)

¹⁶ See 47 USC § 214(e)(1)(A); 47 CFR § 54.201(d)(1).

¹⁷ 47 CFR § 54.101(a)(1).

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.¹⁸ In utilizing the awarded RDOF Phase I funding, REMC will deliver low-latency gigabit broadband services on a fiber-based network consisting of both transport and distribution elements.

Upon designation as an ETC, REMC will be able to provide all of the services required by Section 54.101(a) of the FCC Rules, which including the following:

- 1. *Voice grade access to the public switched network or its functional equivalent***

REMC will provide voice grade access to the public switched telephone network or its equivalent by offering interconnected VoIP service. Specifically, REMC will utilize a VoIP gateway to allow subscribers voice grade access to the public switched telephone network. In the Connect America Fund Order, the FCC modified the definition of a supported service to take a technologically neutral approach, allowing the provision of voice service over any platform, including the public switched telephone network and IP Networks, so long as the service included voice-grade access to the public switched telephone network or its functional equivalent.¹⁹ In so doing, the FCC explained that consumers are increasingly obtaining voice services through VoIP providers offering service over broadband networks, which has come to be viewed by consumers as a substitute for traditional voice telephone service.²⁰ Thus, the FCC concluded that its authority to promote universal service in this context “does not depend on whether interconnected VoIP services are telecommunications services or information services under the Communications Act.”²¹ The FCC confirmed this in its Rural Digital Opportunity

¹⁸ 47 CFR § 54.101(a)(2).

¹⁹ *Connect America Fund Order*, 26 FCC Rcd at 17692-93.

²⁰ *Connect America Fund Order*, 26 FCC Rcd at 17714

²¹ *Id.*

Fund Order.²² REMC may satisfy this ETC requirement by providing interconnected VoIP service in the awarded census block groups.

2. *Minutes of use for local service provided at no additional charge to end users*

As part of the voice grade access to the public switched telephone network, an ETC must provide minutes of use for local service at no additional charge to end-users.²³ The FCC has yet to specify a minimum amount of local usage to be offered by an ETC, but REMC will offer rate plans that provide subscribers with minutes of use for local service at no additional charge.

3. *Access to emergency services provided by local government or other public safety organizations*

REMC will provide access to emergency services for its customers in the requested ETC service area, including access to both 911 and enhanced 911 service from local public service answering points.

4. *Toll limitation services to qualifying low-income customers*

Toll limitation means both toll block and toll control, or if a carrier is not capable of providing both toll blocking and toll control, then toll limitation is defined as either toll blocking or toll control. The VoIP service offerings provided by Jasper County REMC will not distinguish between toll and non-toll calls. However, to the extent necessary to comply with this requirement, REMC will offer toll limitation to qualifying low-income customers within its designated ETC service area at no additional charge.

5. *Capability to transmit data to and receive data by wire or radio from all or substantially all internet endpoints*

²² *Rural Digital Opportunity Fund Order*, 35 FCC Rcd 686 at ¶ 43.

²³ 47 CFR § 54.101(a)(1).

Pursuant to 47 CFR § 54.101(a)(2), REMC will provide broadband services with 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 communications service, but excluding dial-up service.²⁴

C. Petitioner Will Advertise the Availability of Supported Services.

Petitioner will broadly advertise the availability and rates for the voice telephony and broadband access services to be offered within the designated ETC service area using media of general distribution as required by Section 54.201(d)(2) of the FCC Rules.²⁵

Specifically, REMC will advertise these services via outdoor media, such as billboards, and printed materials, such as local newspapers and festival guides. Additionally, REMC will advertise the services during public events, such as festivals and school sporting events. REMC will use its current website to advertise and allow potential subscribers to sign up for services and will use social media to advertise and monitor analytics to ensure REMC reaches its target audience within the designated ETC service area.

For Lifeline services, REMC will advertise the availability of these services and charges through media of general distribution in a manner reasonably designed to reach potential Lifeline customers and make them aware of such offerings, as required by 47 CFR § 54.405(b), including by disclosing Petitioner's name, that the service is a Lifeline service, that it is a government assistance program, that the service is non-transferable, and that it is available only to eligible consumers and limited to one discount per household.

D. Area of Designation as an ETC

REMC has attached as **Exhibit A** hereto a map that outlines the specific areas of the

²⁴ 47 CFR § 54.101(a)(2).

²⁵ See 47 CFR § 54.201(d)(2).

state to receive REMC's low-latency gigabit broadband service pursuant to the RDOF Phase I funding provisionally awarded to REMC. These areas comprise the area for which REMC is seeking ETC designation in this Verified Petition. Specifically, REMC's requested service area includes all of the census block groups for which it was awarded RDOF Phase I funding in Auction 904.

The awarded census block groups overlap with the ILEC study area of: United Telephone Company of Indiana, Inc. d/b/a CenturyLink, which is not a rural telephone company as defined in 47 CFR § 51.5. Similar to the CAF Phase II process, the FCC waived the statutory requirement that the ETC service area of a Rural Digital Opportunity Fund participant conform to the service area of the rural telephone company serving the same area.²⁶ The FCC stated that this waiver "eliminates the need for redefinition of any rural telephone company service areas in the context of the Rural Digital Opportunity Fund competitive bidding process".²⁷ Thus, REMC's request is not subject to the additional requirements of 47 CFR § 54.207(b)-(d) related to the redefinition of a rural telephone company's study area for a competing carrier's ETC designation. Thus, REMC's request is not subject to the additional requirements of 47 CFR § 54.207(b)-(d) related to the redefinition of a rural telephone company's study area for a competing carrier's ETC designation.

E. Additional Requirements under GAO 2013-2

1. *Submission of five-year plan*

In accordance with the ETC designation requirements applicable to winning bidders in Auction 904 adopted by the FCC, REMC requests that, to the extent necessary, the Commission waive the requirement contained in the Commission's General Administrative

²⁶ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd 686 para 93-94 (January 30, 2020).

²⁷ *Id.*

Order 2013-2 that ETC applicants file a five-year improvement plan.²⁸ As a RDOF Phase I funding recipient, REMC has provided to the FCC audited financials, cost estimates, and descriptions of proposed improvements to its network throughout the proposed service area.

2. *Ability to remain functional in emergency situations*

In accordance with GAO 2013-2, REMC maintains the ability to remain functional in emergency situations. REMC will provide access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situation.

Specifically, REMC will contract with other carriers to provide redundant voice services via the internet in case of service interruption. On-site generators are installed in the case of local electric power interruption. A UPS battery backup is on-site to handle traffic for a period of eight hours from the switchover electric to the standby generator. REMC fiber customers will have the option to purchase up to a 24-hour standby solution per current FCC regulations.

3. *Consumer Protection and service quality standards*

Pursuant to GAO 2013-2, ETC applicants are required to demonstrate that they will satisfy applicable consumer protection and service quality standards. REMC commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

Specifically, REMC will use state-of-the-art firewall protection to all points within the network to protect against outside threats. Jasper County REMC's Acceptable Use Policy (the

²⁸ General Administrative Order of the Indiana Utility Regulatory Commission 2013-2 (June 26, 2013) ("GAO 2013-2"); *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197, 10-90, Public Notice

“Policy”) is designed to help protect the REMC, its customers, and the internet community in general from irresponsible or, in some cases, illegal activities. The Policy is a non-exclusive list of actions prohibited by Jasper County REMC. REMC reserves the right to modify the Policy at any time, effective upon posting at www.jasperremc.com/fiber.

F. Designation of Petitioner as an ETC Will Promote Public Interest

One of the principal goals of the Act, as amended by the Telecommunications Act of 1996, is “to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies” to all citizens, regardless of geographic locations or income.²⁹ REMC’s designation as an ETC will offer advantages to rural customers within the designated service area and will not have a negative impact on the Universal Service Fund.

1. *Advantages of REMC’s services*

REMC will use the RDOF Phase I funding that it has been provisionally awarded to directly advance the FCC’s goal of deploying voice and broadband-capable networks in rural, high-cost areas, to ensure that rural consumers can benefit from the latest communications technology, and to provide critical connectivity to residents and businesses that lack access to such services. Further, the availability of REMC’s voice and broadband services will promote economic growth in rural Indiana communities by providing necessary infrastructure and will promote increased competition within the areas to be served by REMC, providing consumers with additional choices and services at competitive rates.

Because the FCC has already reviewed REMC’s proposed service offerings to be provided using RDOF Phase I funding and determined that REMC is eligible to receive said

²⁹ Telecommunications Act of 1996, Pub. LA. No. 104-104, 110 Stat. 56 (1996).

funding, there can be no doubt that the FCC considers REMC's provision of these services to promote the public interest by providing underserved areas with broadband and voice services using funds that have already been set aside for that very purpose. Because designation of REMC as an ETC in the proposed service areas will allow for the provisionally approved project to move forward, such designation will promote the public interest.

2. *Impact on Universal Service Fund*

The funds provisionally awarded to REMC through Auction 904 will come directly from the \$20.4 billion set aside by the FCC for RDOF funding. Therefore, REMC's use of the Universal Service Fund for the provision of the services described herein will have no *per se* impact on the fund. The RDOF Phase I funding was awarded pursuant to a competitive bidding process that was designed to allocate this set-aside funding to the service providers that could demonstrate that they could efficiently and cost-effectively provide the desired level of services to underserved areas. Additionally, any Lifeline support that REMC receives will have a *de minimis* impact on the fund, which the FCC has determined would be outweighed by the benefit of increasing participation in the Lifeline program. Finally, all providers are required to contribute a portion of their interstate revenues to the Universal Service Fund. In accordance with federal regulations, REMC will contribute to the Universal Service Fund based upon the portion of its revenues determined to be interstate. Thus, approving REMC as an ETC will create contributions to the Universal Service Fund that were previously nonexistent.

IV. PETITIONER WILL COMPLY WITH LIFELINE CERTIFICATION AND VERIFICATION REQUIREMENTS OF 47 CFR § 54.410

Pursuant to 47 CFR § 54.405, REMC, as an ETC designated in the service areas described herein, will: (a) make available Lifeline service, as defined in 47 CFR § 54.401, to qualifying low-income consumers; (b) publicize the availability of Lifeline service in a manner

reasonably designed to reach those likely to qualify for the service; (c) indicate on all materials describing the service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, that the service is non-transferrable, that only eligible consumers may enroll in the program, and that the program is limited to one discount per household; and (d) disclose REMC's name on all materials describing the service. REMC will publicize Lifeline services in the requested service area by utilizing the same media outlets as described herein for the advertisement of telephone and internet services and including any and all required statements pertaining to the availability of Lifeline Services. Guidelines for participation in Lifeline will be available on REMC's website and printed materials.

V. REGULATORY COMMITMENTS

A. Petitioner Will Provide Notice of Changes to the Commission

As required by the Commission's 1996 ETC Order in Cause No. 41052, REMC agrees to notify the Commission in the future upon any change affecting REMC's eligibility for ETC designation.

B. Petitioner Will Pay All Applicable Fees

As a part of its application for ETC, REMC agrees to pay all fees applicable to ETCs as required by law.

VI. SERVICE

The names and addresses of REMC's counsel authorized to be served with all pleadings, discovery, docket entries, orders and documents relevant to this Cause are:

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VII. PROCEDURAL SCHEDULE

For purposes of this proceeding, REMC and the OUCC have agreed to the following procedural schedule:

REMC Files Petition and Case-in-Chief	January 6, 2021
OUCC/Intervenors Filing	February 5, 2021
REMC Rebuttal (if any)	February 19, 2021
Evidentiary Hearing	Subject to the availability of the Presiding Officers and Commission staff, Petitioner requests that the evidentiary hearing be scheduled on any of the following dates agreed upon by the OUCC: March 11, 12 or 15-19, 2021, or the earliest date thereafter that would be convenient for the Commission and the Parties.
Order	On or before June 7, 2021 (180 days after FCC Public Notice of Closing of Auction 904)

VIII. CONCLUSION

Based on the foregoing, designation of Jasper County REMC as an ETC in the state of Indiana as required herein accords with the requirements of Section 214(e) of the Act and is in the public interest.

WHEREFORE, Jasper County REMC respectfully requests that the Commission promptly designate Jasper County REMC as an ETC in the state of Indiana with respect to the service areas identified in **Exhibit A**.

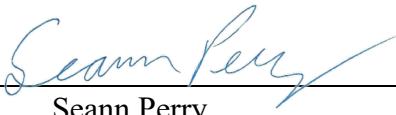
Respectfully submitted,

By: /s/ Erin C. Borissov
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VERIFICATION

I affirm under penalties of perjury that the foregoing representations are true to the best of my knowledge, information and belief.

Dated: 01/06/2021



Seann Perry
Broadband Manager
Jasper County REMC

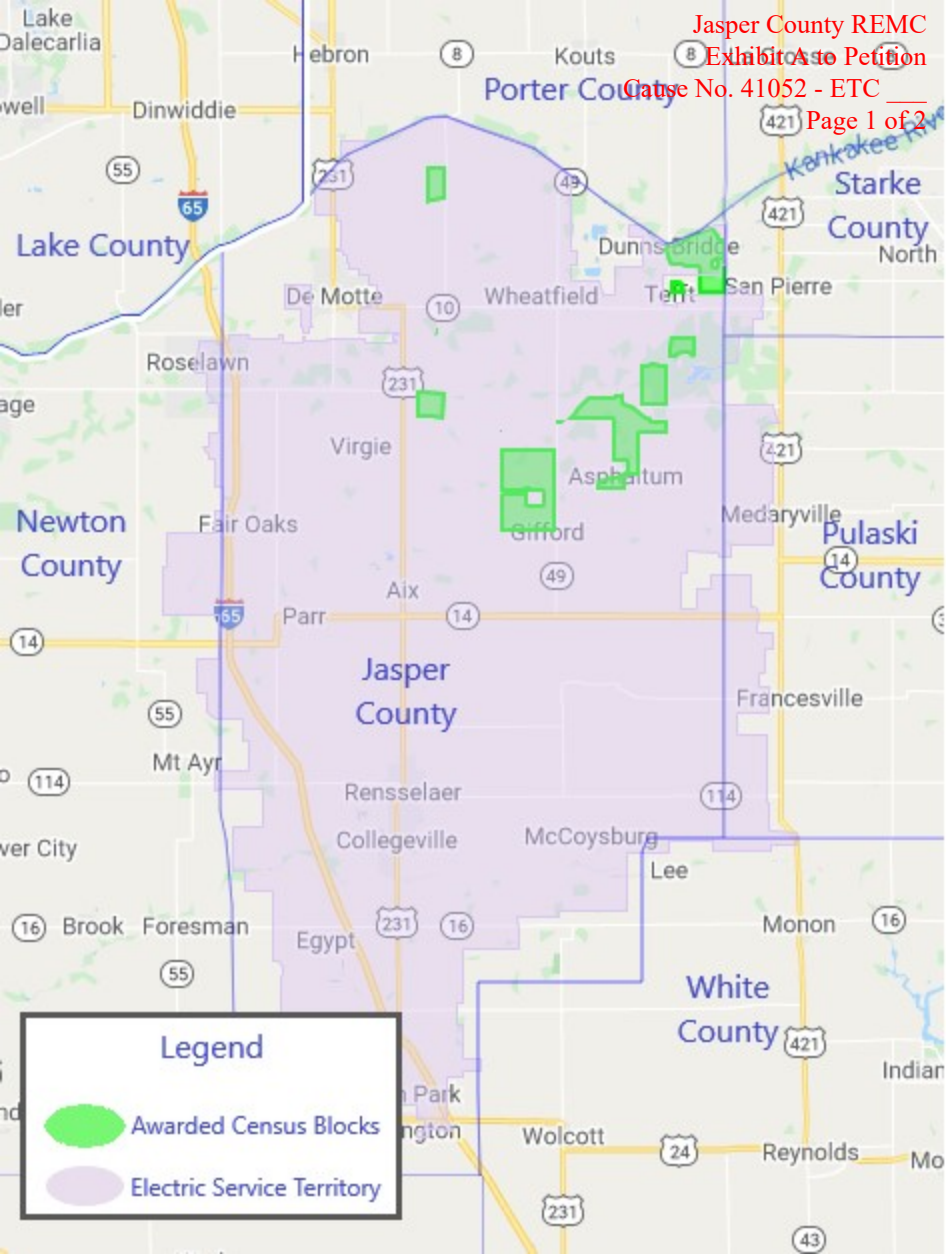
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Verified Petition for Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Connect America Fund Phase II Support has been electronically served upon the following this 6th day of January, 2021:

Indiana Office of Utility Consumer Counselor
115 W. Washington Street, Suite 1500 South
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/s/ Erin C. Borissov

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CBG's Awarded to Jasper County REMC – FCC Auction 904 – RDOF Phase 1

Census Block Group 180731009011 – Awarded \$2477.40 – 8 Locations

Census Blocks:

180731009011030
180731009011082

Census Block Group 180731010001 – Awarded \$4320.60 – 41 Locations

Census Blocks:

180731010001039
180731010001041
180731010001052

Census Block Group 180731008001 – Awarded \$15318.00 – 135 Locations

Census Blocks:

180731008001001	180731008001042	180731008001053
180731008001023	180731008001043	180731008001054
180731008001029	180731008001044	180731008001056
180731008001030	180731008001046	180731008001057
180731008001032	180731008001047	180731008001067
180731008001034	180731008001048	180731008001071
180731008001035	180731008001050	180731008001072
180731008001036	180731008001051	
180731008001037	180731008001052	

Census Block Group 180731008002– Awarded \$6031.00 – 78 Locations

Census Blocks:

180731008002003	180731008002031
180731008002007	180731008002032
180731008002008	180731008002033
180731008002009	180731008002040
180731008002011	180731008002057
180731008002015	180731008002098
180731008002016	180731008002099
180731008002030	