

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF )  
SOUTHEASTERN INDIANA RURAL )  
ELECTRIC MEMBERSHIP CORPORATION )  
FOR DESIGNATION AS AN ELIGIBLE ) CAUSE NO. 41052 – ETC -90  
TELECOMMUNICATIONS CARRIER FOR )  
THE PURPOSE OF RECEIVING RURAL )  
DIGITAL OPPORTUNITY FUND PHASE I )  
SUPPORT )

**DIRECT TESTIMONY OF BRYAN MILLER IN SUPPORT OF PETITION OF  
SOUTHEASTERN INDIANA RURAL ELECTRIC MEMBERSHIP CORPORATION  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

**Q1. PLEASE STATE YOUR FULL NAME AND TITLE.**

A1. My name is Bryan Miller, and I am the Director of Office Services for Southeastern  
Indiana Rural Electric Membership Corporation (“REMC” or “the Cooperative”).

**Q2. WHAT ARE YOUR JOB RESPONSIBILITIES FOR SOUTHEASTERN  
INDIANA RURAL ELECTRIC MEMBERSHIP CORPORATION?**

A2. I oversee IT and Information Security process and policy. I manage integration of third-  
party networks and information sharing as well as oversee facility construction project  
and repairs. I supervise building software and calculation. Lastly, I managed the REMC  
fiber project beginning with the feasible study.

**Q3. PLEASE PROVIDE INFORMATION ON YOUR PROFESSIONAL  
BACKGROUND.**

A3. I have a bachelor’s degree in Finance with a minor in Marketing from Anderson  
University. My MBA was acquired from Indiana Wesleyan University. I have worked at  
the Cooperative in many capacities over the past 18 years, which includes managing the  
implementation of our AMR (Automated Meter Reading) program. The implementation

consisted of engineering the changeout of 25,000 meters and insuring device communication to each endpoint back to our headquarters.

**Q4. PLEASE PROVIDE BACKGROUND INFORMATION ON REMC.**

A4. 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 712 S Buckeye St. Osgood, IN. REMC has traditionally provided electric utility service within counties in Indiana, including Ripley, Dearborn, Ohio, Switzerland, Jefferson, Jennings, Franklin. REMC holds a Certificate of Public Convenience and Necessity issued on April 21, 1939 in Cause No. 13806.

**Q5. DOES REMC CURRENTLY HOLD A CERTIFICATE OF TERRITORIAL AUTHORITY TO PROVIDE COMMUNICATIONS SERVICE?**

A5. On November 24, 2020, Southeastern Indiana REMC submitted an Application for a Certificate of Territorial Authority to provide communications service in Cause No. 45459, and on January 6, 2021, the REMC submitted an amended application in Cause No. 45459. That application is still pending with the Commission.

**Q6. PLEASE SUMMARIZE REMC'S REQUEST IN THIS PROCEEDING.**

A6. Pursuant to Section 214(e)(2) of the Communications Act of 1934 (the "Act") and Section 54.201 of the FCC's rules, REMC requests designation as an eligible telecommunications carrier ("ETC") within specified areas to become authorized to receive support from the Rural Digital Opportunity Fund ("RDOF") Phase I. REMC was provisionally awarded RDOF Phase I support from the FCC on December 7, 2020, subject to completing certain requirements, such as being designated as an ETC in the funded areas. Pursuant to Section 54.101(d) of the FCC's rules, any ETC, including an ETC designated to receive high-cost support, must offer Lifeline service in its designated

service area. Accordingly, to the extent necessary, REMC also requests designation as a Lifeline provider within the requested service area. REMC respectfully requests that the Commission grant this petition on or before its June 2, 2021 weekly conference to ensure that REMC meets the FCC's June 7, 2021 deadline for designation as an ETC in order to receive the RDOF Phase I support provisionally awarded to REMC.

**Q7. PLEASE PROVIDE A BRIEF OVERVIEW OF THE RURAL DIGITAL OPPORTUNITY FUND.**

A7. 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 Connected 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.<sup>1</sup>

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 services.<sup>2</sup> The minimum supported speed under RDOF is 25/3 Mbps, but the auction rules gives 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

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<sup>1</sup> 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 (*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*).

<sup>2</sup> *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").

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 blocks 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 blocks that are only partially served, as well as census blocks unawarded in the Phase I auction.<sup>3</sup>

**Q8. PLEASE PROVIDE A BRIEF OVERVIEW OF THE RDOF PHASE I AUCTION.**

A8. The FCC used the same two-step application process for RDOF Phase I as was used for CAF Phase II. Potential bidders, including REMC, were required to submit a short-form application to establish eligibility to participate in the auction. The short form required REMC to provide ownership information and certify as to its qualifications to receive support. The Bureau of Wireline Competition reviewed the short-form applications and approved bidders, including REMC, as qualified to participate in the auction.

Consistent with the process used in the CAF Phase II auction, winning bidders in RDOF Phase I such as REMC must file a long-form application that demonstrates the bidder is legally, technically and financially qualified to receive support. The long-form application includes ownership disclosure, financial and technical capability certification, public interest obligations certification, an extensive description of technology and system design, available funds certification, and ETC eligibility and documentation.<sup>4</sup>

Winning bidders, including REMC, must also provide an irrevocable standby letter of credit to ensure that awarded funds can be recovered if the recipient does not comply with the RDOF Phase I deployment and service requirements.

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<sup>3</sup> In the Matter of Rural Digital Opportunity Fund et al., Report and Order, 35 FCC Rcd 686 (January 30, 2020) (“*Rural Digital Opportunity Fund Order*”);

<sup>4</sup> See generally, *Rural Digital Opportunity Fund Order*, 35 FCC Rcd 686.

**Q9. PLEASE DESCRIBE REMC’S SHORT FORM APPLICATION FOR THE RDOF PHASE I AUCTION 904.**

A9. Following the procedure established in the Auction 904 Notice,<sup>5</sup> 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 network using RDOF Phase I funding.

REMC’s proposed deployment consists of an aerial and underground fiber-based network consisting of both transport and distribution elements and 1 GB services to end users. REMC’s low-latency gigabit performance tier will be delivered by fiber and provide service in Ripley, Dearborn, Ohio, Switzerland, Jefferson, Jennings and Franklin counties. Based upon its Form 183 short-form application, the FCC determined that REMC met the 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.

**Q10. PLEASE DESCRIBE REMC’S AUCTION 904 WINNING BIDS.**

A10. On December 7, 2020, the FCC announced the winning bidders of Auction 904, including REMC, which was awarded \$888,747 in RDOF Phase I funding to provide gigabit, low-latency service to 5,107 locations within twenty-seven (27) census block groups. All gigabit locations will be built out over the next six (6) years.

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<sup>5</sup> *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”).

**Q11. PLEASE DESCRIBE REMC’S SUBSEQUENT AUCTION 904 LONG FORM APPLICATION.**

A11. Winning bidders must submit the FCC Form 683 long-form post-auction application for support by January 29, 2021 in order to become authorized by the FCC to receive the support awarded during Auction 904.<sup>6</sup> REMC will submit its FCC Form 683 application by the January 29, 2021 deadline.

As part of the long-form application, REMC must acknowledge that it must be designated by the Commission as an ETC for all of the eligible census blocks covered by its winning bid. REMC has 180 days from the release of the Auction 904 closing public notice (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.<sup>7</sup> 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.

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<sup>6</sup> *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”).

<sup>7</sup> *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.

**Q12. PLEASE DESCRIBE THE SERVICES AND PLANS THAT REMC INTENDS TO OFFER IN THE REQUESTED SERVICE AREA USING RDOF PHASE I SUPPORT.**

A12. REMC will offer interconnected VoIP service and high-speed broadband service. The following services and plans will be offered by REMC d/b/a SEI Fiber to meet the obligations related to RDOF Phase I support. All plans are gigabit-capable.

- |                  |          |
|------------------|----------|
| • 100/100 Mbps   | \$64.95  |
| • 500/500 Mbps   | \$74.95  |
| • 1000/1000 Mbps | \$109.05 |

Attached hereto as **Exhibit BM-1** is the initial project overview and deployment timeline and milestones for the deployment of facilities and service within the twenty-seven (27) census block groups for which REMC was awarded funding.

**Q13. IS REMC MANAGERIALLY, FINANCIALLY AND TECHNICALLY CAPABLE OF PROVIDING THE SERVICES TO BE PROVIDED USING RDOF PHASE I SUPPORT?**

A13. Yes. The board of directors and management team of REMC are familiar with the managerial, financial and technical needs of a public utility, having served in the electric utility industry for more than 80 years, providing critical utility service to rural customers throughout that time.

In October 2020, Southeastern Indiana REMC and SEI Data, Inc. executed a Joint Venture Agreement to bring broadband to the underserved members of Southeastern Indiana REMC. The REMC is responsible for building and maintaining the fiber network and providing retail broadband and VoIP service, while SEI Communications is responsible for maintaining the network equipment and providing the backhaul connection. Each respective Cooperative brings similar member and non-profit views to

the venture. REMC will utilize its 3,400 miles of existing infrastructure to facilitate deployment of the fiber network. SEI Data, Inc. brings over 30 years of knowledge, experience and infrastructure to the project. Retail service will be provided by REMC under its assumed business name of SEI Fiber.

Additionally, REMC has provided to the FCC, pursuant to the Auction 904 procedure, audited financial statements, including balance sheets, net income and cash flow, which have been audited by an independent certified public accountant. As evidenced by the FCC's selection of REMC as a winning bidder in Auction 904, the FCC is satisfied, based upon the financial information provided, that REMC is financially capable of providing the required services.

**Q14. WHAT IS THE SERVICE AREA IN WHICH REMC SEEKS DESIGNATION AS AN ETC IN THIS PROCEEDING?**

A14. In the *Public Notice of Winning Bidders*, REMC was named the winning bidder for twenty-seven (27) eligible census block groups in Franklin, Jennings, Ripley, Dearborn, Ohio, Jefferson and Switzerland counties in Indiana, for a total of \$888,747 in RDOF Phase I funding. This funding will facilitate serving 5,107 customers throughout the 27 census block groups. Thus, REMC is requesting designation as an ETC in the associated census block groups listed in **Exhibit BM-2**, which is attached hereto. Maps of the awarded census blocks were attached as **Exhibit A to REMC's Verified Petition in this Cause**. The awarded census block groups are within Franklin, Jennings, Ripley, Dearborn, Ohio, Jefferson and Switzerland counties in Indiana.



The awarded census block groups overlap with the ILEC study areas of: United Tel. Co. of Indiana, Frontier North, Inc., and Cincinnati Bell Telephone Co., which are not rural telephone companies as defined in 47 CFR § 51.5, and Sunman Telecommunications LLC and Southeastern Indiana Rural Telephone Cooperative, Inc., which are rural telephone companies as defined in 47 CFR § 51.5. However, 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.<sup>8</sup> 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”.<sup>9</sup>

**Q15. IF DESIGNATED AS AN ETC, WILL REMC PROVIDE THE REQUIRED VOICE AND BROADBAND SERVICES THROUGHOUT THE ENTIRE DESIGNATED SERVICE AREA?**

A15. Yes. REMC intends to provide all of the required services in the census blocks it was awarded during Auction 904 and for which it is requesting ETC designation.

**Q16. IS REMC A COMMON CARRIER PURSUANT TO 47 USC § 153(11)?**

A16. Yes. The term “common carrier” includes any person engaged as a common carrier for hire in interstate or foreign communication by wire or radio.<sup>10</sup> REMC will offer communication services for sale to the public by wire and transmits communications both interstate and intrastate, making it a “common carrier” for purposes of being designated at an ETC and receiving universal service support.

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<sup>8</sup> *Rural Digital Opportunity Fund Order*, 35 FCC Rcd 686 para 93-94 (January 30, 2020).

<sup>9</sup> *Id.*

<sup>10</sup> 47 USC § 153(11).

**Q17. WILL REMC PROVIDE SERVICES REQUIRED TO BE PROVIDED BY AN ETC USING ITS OWN FACILITIES OR VIA RESALE OF ANOTHER CARRIER'S SERVICES?**

A17. Consistent with the requirements of Section 214(e)(1) of the Act and sections 54.101 through 54.207 of the FCC's rules, REMC will provide all services required in order to be eligible for high-cost universal service support using its own facilities or, if necessary, through resale of another carrier's services. Specifically, REMC will use a fiber-based network consisting of transport and distribution elements and a gigabit passive optical network to provide services to end users in the requested service area.

**Q18. WILL REMC PROVIDE VOICE GRADE ACCESS TO THE PUBLIC SWITCHED TELEPHONE NETWORK OR ITS EQUIVALENT?**

A18. As set forth in the Verified Petition, REMC will provide voice grade access to the public switched telephone network or its equivalent through VoIP a VoIP gateway. 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 VoIP, so long as the service includes voice-grade access to the public switched telephone network or its functional equivalent.<sup>11</sup> REMC therefore satisfies the requirement to provide voice grade access to the public switched telephone network or its functional equivalent by using a VoIP gateway.

**Q19. WILL REMC PROVIDE MINUTES OF USE FOR LOCAL SERVICE AT NO ADDITIONAL CHARGE TO END USERS?**

A19. 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.<sup>12</sup> The FCC has yet to specify a minimum amount of local usage to be offered by an ETC, but REMC

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<sup>11</sup> *Connect America Fund Order*, 26 FCC Rcd at 17692-93.

<sup>12</sup> 47 CFR § 54.101(a)(1).

will offer rate plans that provide subscribers with minutes of use for local service at no additional charge.

**Q20. WILL REMC PROVIDE ACCESS TO EMERGENCY SERVICES?**

A20. 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 (“PSAPs”). Using its voice server platform, REMC will provision a 911 or E911 address for use with PSAP offices within the serving area.

**Q21. WILL REMC PROVIDE TOLL LIMITATION SERVICES TO QUALIFYING LOW-INCOME CUSTOMERS?**

A21. REMC will offer toll limitation to qualifying low-income customers at no additional charge within the service area requested in this Cause. REMC will ask on the application if the client wishes to toll block 900 numbers at startup. The client will also be permitted to change their initial decision within sixty (60) days of the service becoming active. Changes after that initial sixty (60)-day period must be in writing to REMC, thereby providing toll control after the initial period.

**Q22. WILL THE BROADBAND SERVICES PROVIDED BY REMC IN THE REQUESTED SERVICE AREA BE CAPABLE OF TRANSMITTING AND RECEIVING DATA FROM ALL OR SUBSTANTIALLY ALL INTERNET ENDPOINTS?**

A22. Pursuant to 47 CFR § 54.101(a)(2), REMC will provide broadband services with 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 service, but excluding dial-up service. The quality of service will only provide higher priority within REMC’s network for VoIP calls to improve voice quality.

REMC will not prioritize between endpoints, and there is no plan or intent to limit connectivity within or outside the network.

**Q23. HOW WILL REMC ADVERTISE THE AVAILABILITY OF THE VOICE AND BROADBAND SERVICES REQUIRED TO BE PROVIDED BY AN ETC?**

A23. REMC d/b/a SEI Fiber will 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's rules.<sup>13</sup>

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.

REMC intends to follow the FCC's Lifeline advertising guidelines in establishing an advertising program for its Lifeline services to reach eligible households that do not currently receive service. These guidelines suggest posting notices at public transportation stops and agencies, shelters and soup kitchens; running public service announcements; providing information booths at central locations; providing customer service to disabled program participants on an equal basis by using telecommunications relay services ("TRS"), text telephone ("TTY"), and speech-to-speech ("STS") services; and providing outreach materials in Braille. Additionally, the guidelines suggest

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<sup>13</sup> 47 CFR § 54.201(d)(2).

developing advertising that can be read by members of any sizeable non-English speaking populations and coordinating outreach efforts with governmental agencies that administer relevant government assistance programs.

**Q24. WHAT INFORMATION HAS REMC PROVIDED THE FCC THAT SATISFIES THE REQUIREMENTS OF A FIVE-YEAR IMPROVEMENT PLAN WITH RESPECT TO THE SERVICES PROVIDED USING RDOF PHASE I SUPPORT?**

A24. In accordance with the ETC designation requirements applicable to winning bidders in Auction 904 adopted by the FCC, REMC requested in its Verified Petition that the Commission waive the requirement in the Commission's General Administrative Order 2013-2 that REMC file a five-year improvement plan.<sup>14</sup> As an Auction 904 winning bidder, REMC has provided the FCC with audited financials, cost estimates and descriptions of proposed improvements to its network throughout the proposed service area.

**Q25. EXPLAIN THE CAPABILITY OF REMC TO REMAIN FUNCTIONAL IN EMERGENCY SITUATIONS.**

A25. REMC provides 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 situations. In its Verified Petition, REMC described each way that it is capable of remaining functional in emergency situations for the requested ETC service area.

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<sup>14</sup> 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 (DA 18-714) (WCB July 10, 2018).

**Q26. EXPLAIN HOW REMC INTENDS TO COMPLY WITH APPLICABLE CONSUMER PROTECTION AND SERVICE QUALITY STANDARDS WITH RESPECT TO THE SERVICES PROVIDED USING RDOF PHASE I SUPPORT.**

A26. REMC commits to satisfying all applicable state and federal requirements related to consumer protection and service quality standards with respect to the services provided using RDOF Phase I support. For example, REMC will use state-of-the-art firewall protection to all points within the network to protect against outside threats. REMC's Acceptable Use Policy (the "Policy") is designed to help protect 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 REMC d/b/a SEI Fiber. REMC d/b/a SEI Fiber reserves the right to modify the Policy at any time, effective upon posting at [www.seifiber.com](http://www.seifiber.com).

**Q27. HOW WILL REMC'S SERVICE OFFERINGS RECEIVING RDOF PHASE I SUPPORT BENEFIT INCREASED CONSUMER CHOICE?**

A27. The requested ETC service areas generally considered unserved or underserved by communication providers. REMC's service offerings will provide services to some customers who currently do not have access to such services. To the extent some customers within the ETC areas already have access to some level of service, REMC's service offerings in the requested ETC service area will promote increased competitive choice, thereby increasing innovation and incentivizing other carriers to improve their existing networks to remain competitive. This will ultimately result in greater access to high-speed broadband and voice services, as well as improved service quality for customers in the requested ETC service area.

**Q28. PLEASE EXPLAIN THE UNIQUE ADVANTAGES OF REMC'S SERVICE OFFERINGS RECEIVING RDOF PHASE I SUPPORT.**

A28. As fully set forth in the Verified Petition, REMC's use of the RDOF Phase I support in the awarded census blocks will directly advance the Act's principal goals of securing lower prices and higher quality services for consumers and encouraging the rapid deployment of new technology to all citizens regardless of location or income.<sup>15</sup> Not only will REMC's service offerings in the designated ETC service area provide critical high-speed and reliable connectivity to consumers and promote economic growth and competition, it also has been determined by the FCC, in awarding RDOF Phase I support to REMC, that said service offerings would promote the public interest.

REMC was formed more than 80 years ago by members who united in their cause to bring new services, in that case, electricity, to their homes and farms. Broadband and voice services are now essential in rural areas to spur economic growth, provide access to virtual learning and health care, allow residents to work and socialize remotely, and utilize modern entertainment options. REMC's members and directors have a passion to provide services to underserved and unserved areas. REMC applied for RDOF Phase I support to provide services for its members and surrounding areas, which have not previously been adequately served by other providers.

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<sup>15</sup> *Telecommunications Act of 1996*, Pub. L. No. 104-104, 110 Stat. 56.

**Q29. PLEASE EXPLAIN HOW REMC'S USE OF RDOF PHASE I SUPPORT WILL IMPACT THE UNIVERSAL SERVICE FUND.**

A29. As set forth in the Verified Petition, the funds awarded to REMC pursuant to Auction 904 have already been set aside by the FCC for that specific purpose; thus, REMC's use of said funds will have no *per se* impact on the Universal Service Fund. The use of Auction 904 to award the funds ensured that funding went to bidders who could provide services to unserved or underserved areas for the lowest possible cost to the Universal Service Fund. Additionally, as set forth in the Verified Petition, permitting REMC to provide services in previously unserved areas will increase the contributions the REMC makes to the Universal Service Fund based upon a portion of its revenues.

**Q30. IS THE DESIGNATION OF REMC AS AN ETC IN THE REQUESTED SERVICE AREA IN THE PUBLIC INTEREST?**

A30. Yes. As explained herein, REMC's designation as an ETC in the requested service area and subsequent provision of services in this area would benefit increased consumer choice, provide unserved and underserved areas with critical communications infrastructure and promote economic development without having a detrimental impact upon the Universal Service Fund. Such designation furthers the goals of the Act and subsequent FCC rules.

**Q31. PLEASE DESCRIBE REMC'S PLANNED LIFELINE SERVICE OFFERINGS IN THE REQUESTED SERVICE AREA.**

A31. REMC will provide Lifeline voice and broadband service throughout the areas covered by its winning RDOF bids to qualifying low-income consumers pursuant to the Lifeline program rules.<sup>16</sup> The terms and conditions of REMC's Lifeline offering will be posted on REMC's website at [seifiber.com](http://seifiber.com). They include details on the number of minutes provided

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<sup>16</sup> See 47 CFR §§ 54.101(c), (d), 54.405(a); 47 CFR Subpart E; Lifeline and Link Up Reform and Modernization et al., Third Report and Order et al., WC Docket No. 11-42 et al., 31 FCC Rcd 3962 (2016).



as part of the plan, additional charges (if any) for toll calls, and rates for each plan.

Additionally, customers will be provided with these terms after completion of enrollment.

Annually, REMC will complete income verifications based on information provided by Lifeline.

**Q32. HOW WILL REMC ADVERTISE AND DISCLOSE THE TERMS OF ITS LIFELINE SERVICE OFFERINGS TO QUALIFYING CUSTOMERS?**

A32. REMC will advertise the availability of Lifeline 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 REMC'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. Specifically, REMC will advertise the availability of Lifeline services using the same media outlets as described herein for the advertisement of telephone and internet services and including 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.


**Q33. DOES THIS CONCLUDE YOUR TESTIMONY?**

A33. Yes.

**VERIFICATION**

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

Dated: 1-6-2021

  
Bryan Miller  
Director of Office Service  
Southeastern Indiana 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 6<sup>th</sup> day of January, 2021:

Indiana Office of Utility Consumer Counselor  
115 W. Washington Street, Suite 1500 South  
Indianapolis, Indiana 46204  
[infomgt@oucc.ingov](mailto:infomgt@oucc.ingov)

\_\_\_\_\_  
/s/ Erin C. Borissov

Erin C. Borissov (27745-49)  
PARR RICHEY FRANDSEN  
PATTERSON KRUSE LLP  
251 N. Illinois Street, Suite 1800  
Indianapolis, Indiana 46204

## **Southeastern Indiana REMC**

### **Fiber and Broadband Project Deployment Timeline and Milestones**

Year 1 - Obtain the Indiana ETC status; obtain easement or purchase land for OLT sites; obtain any easements and/or state and county permits for Fiber ROW; determine Fiber Transport and Fiber Transit necessary for initial deployment and utilization; complete fiber construction of redundant ring and interconnections to SEI Communications network; begin fiber construction with 500 homes passed and 300 potentially served

Year 2 - Continue Staking of Fiber Plant; Continue installation of OLT sites; Continue Fiber Construction with 1000 homes passed and 600 potentially served; maintenance areal fiber ROW; place network equipment in second and third headend location for redundancy.

Year 3 - Continue Staking of Fiber Plant; Continue Fiber Construction with 1000 homes passed and 600 potentially served; maintenance areal fiber ROW; develop fiber transport to Jackson County REMC

Year 4 - Continue Staking of Fiber Plant; Continue Fiber Construction with 1000 homes passed and 600 potentially served; maintenance areal fiber ROW; develop Fiber Transport to South Central County REMC.

Year 5 - Continue Staking of Fiber Plant; Continue Fiber Construction with 1000 homes passed and 600 potentially served; maintenance areal fiber ROW; Upgrade Fiber Transit.

Year 6 - Complete Fiber Construction with 607 homes passed and 364 potentially served; Service available to 100% of locations by EOY; maintenance areal fiber ROW; evaluate and upgrade Fiber OLT cards at 18 sites.

Year 7 - Maintenance and Upgrades as necessary based on 75% utilization.

Year 8 - Maintenance and Upgrades as necessary based on 75% utilization; Upgrades on VOIP.

Year 9 - Maintenance and Upgrades as necessary based on 75% utilization.

Year 10 - Maintenance and Upgrades as necessary based on 75% utilization.

## Southeastern Indiana REMC Proposed ETC Area and RDOF Phase I Census Block Groups

Auction	Bidder	FRN	GEOID	CBG ID	County	State	Primary ILEC
904: RDOF	Southeastern Indiana REMC	2901957	180290802011	180290802011	Dearborn	Indiana	Sunman
904: RDOF	Southeastern Indiana REMC	2901957	180290802021	180290802021	Dearborn	Indiana	Cincinnati Bell
904: RDOF	Southeastern Indiana REMC	2901957	180290802023	180290802023	Dearborn	Indiana	Cincinnati Bell
904: RDOF	Southeastern Indiana REMC	2901957	180290802024	180290802024	Dearborn	Indiana	Cincinnati Bell
904: RDOF	Southeastern Indiana REMC	2901957	180290806002	180290806002	Dearborn	Indiana	UTC OF INDIANA
904: RDOF	Southeastern Indiana REMC	2901957	180290806003	180290806003	Dearborn	Indiana	UTC OF INDIANA
904: RDOF	Southeastern Indiana REMC	2901957	180290806005	180290806005	Dearborn	Indiana	SE Ind Rural
904: RDOF	Southeastern Indiana REMC	2901957	180290807001	180290807001	Dearborn	Indiana	UTC OF INDIANA
904: RDOF	Southeastern Indiana REMC	2901957	180290807004	180290807004	Dearborn	Indiana	SE Ind Rural
904: RDOF	Southeastern Indiana REMC	2901957	180479698003	180479698003	Franklin	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	180779660003	180779660003	Jefferson	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	180799602002	180799602002	Jennings	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	180799602003	180799602003	Jennings	Indiana	SE Ind Rural
904: RDOF	Southeastern Indiana REMC	2901957	180799606002	180799606002	Jennings	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181159657002	181159657002	Ohio	Indiana	UTC OF INDIANA
904: RDOF	Southeastern Indiana REMC	2901957	181379684002	181379684002	Ripley	Indiana	Sunman
904: RDOF	Southeastern Indiana REMC	2901957	181379684003	181379684003	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181379687001	181379687001	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181379687002	181379687002	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181379687003	181379687003	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181379688002	181379688002	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181379688003	181379688003	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181379689002	181379689002	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181379689003	181379689003	Ripley	Indiana	Frontier
904: RDOF	Southeastern Indiana REMC	2901957	181559657003	181559657003	Switzerland	Indiana	UTC OF INDIANA
904: RDOF	Southeastern Indiana REMC	2901957	181559658001	181559658001	Switzerland	Indiana	SE Ind Rural
904: RDOF	Southeastern Indiana REMC	2901957	181559659002	181559659002	Switzerland	Indiana	UTC OF INDIANA