

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF)
JACKSON COUNTY RURAL ELECTRIC)
MEMBERSHIP CORPORATION FOR)
DESIGNATION AS AN ELIGIBLE) CAUSE NO. 41052-ETC 94
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**

Jackson County Rural Electric Membership Corporation (“Jackson County REMC”), by its undersigned counsel and pursuant to Section 214(e)(2) of the Federal Communications Act of 1934 (the “Act”), as codified at 47 USC § 214(e), and the Federal Communications Commission (“FCC”) Universal Service Rules set forth in 47 CFR §§ 54.101 through 54.207 (the “FCC Rules”), hereby petitions and requests the Indiana Utility Regulatory Commission (“Commission”) to issue an order designating Jackson County REMC as an eligible telecommunications carrier (“ETC”) in the state of Indiana to become authorized to receive support from the federal Rural Digital Opportunity Fund (“RDOF”) Phase I in order to expand high-speed broadband and voice services to unserved rural areas of Indiana. As demonstrated herein, Jackson County REMC meets all statutory and regulatory requirements for designation as an ETC in the state of Indiana.

Additionally, Jackson County REMC respectfully requests that the Commission grant this Verified Petition on or before June 7, 2021 to ensure that Jackson County REMC remains eligible to receive the RDOF support that it has been allocated through its participation in the NRTC Phase I Consortium (the “Consortium”), a winner in the FCC’s RDOF Phase I auction.

In support of this Verified Petition, Jackson County REMC states as follows:

I. BACKGROUND

A. Company Overview

Jackson County 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 at 274 E. Base Road, P.O. Box K, Brownstown, IN 47220. Jackson County REMC has traditionally provided electric utility service within the service area designated by the Commission and last modified by Order of the Commission dated November 21, 2018 in Cause No. 45156. On May 9, 2018 in Cause No. 1804-2, the Commission officially acknowledged a Notice of Change to Jackson County REMC's Certificate of Public Convenience and Necessity ("CPCN") issued on April 30, 1937 in Cause No. 12551. This Notice of Change added broadband service to Jackson County REMC's authorized service offerings within in CPCN service area, including portions of Bartholomew, Brown, Clark, Jackson, Jefferson, Jennings, Lawrence, Monroe, Scott and Washington counties. On August 3, 2018 in Cause No. CSP1806-10, the Commission officially acknowledged a Notice of Change to Jackson County REMC's CPCN that added additional areas within Jackson, Jennings, Scott and Washington counties to Jackson REMC's authorized broadband service area. On January 7, 2021, Jackson County REMC filed a Notice of Change to its CPCN to become authorized to provide broadband service and interconnected VoIP as a telecommunications service throughout Indiana, which will encompass all of Jackson County REMC's designated ETC service area as requested herein.

On December 7, 2020, the Consortium was provisionally awarded RDOF support after participating in the FCC's Auction 904, as further described below, and allocated a portion of its winning bids to Jackson County REMC. Therefore, Jackson County REMC hereby requests

the Commission designate it as an ETC within the service area set forth herein, as required for receipt of these RDOF funds. As further described herein, Jackson County REMC will deploy its own fiber-based network and will partner with a third-party vendor to offer interconnected VoIP service over its network.

B. Rural Digital Opportunity Fund

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 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.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 blocks that are *wholly* unserved with broadband at speeds of at least 25/3 Mbps, the FCC reserved some of the funding for Phase II, which will target census blocks

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*”).

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*”).

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

The Consortium 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 services in unserved communities.⁴ On December 7, 2020, the FCC announced the winning bidders of Auction 904, including the Consortium. Post-auction, as the FCC allows pursuant to its Divide Winning Bids procedure, the Consortium allocated the RDOF Phase I support winning census block groups to multiple members of the Consortium, including the assignment of certain census block groups to Jackson County REMC for a total of \$2,188,212 in RDOF Phase I funding over 10 years.⁵ Following the allocation of support, Jackson County REMC was to 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 allocated from the Consortium.⁶ Jackson County REMC will submit its FCC Form 683 application prior to the January 29, 2021 deadline established by the FCC. As part of the long-form application, Jackson County REMC will acknowledge that it must be designated by the Commission as an ETC for all of the eligible census block groups allocated to it by the Consortium. Jackson County 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.⁷ Jackson County REMC will not

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 *Id.*

⁵ *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 (December 7, 2020) (“*Winning Bidders Announcement*”).

⁶ *Id.*

⁷ *Auction 904 Notice*, 35 FCC Rcd 6077. 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

be authorized to receive RDOF Phase I support, nor will any such support be released to Jackson County REMC, if it does not obtain the appropriate ETC designation.

Therefore, in order to fulfill its post-auction obligations for receipt of RDOF Phase I support, Jackson County REMC respectfully submits this Verified Petition for designation as an ETC in the appropriate census block groups as more fully described herein. Moreover, given the limited timeframe provided by the FCC for completion of the post-auction obligations, Jackson County REMC respectfully requests approval of this Verified Petition by no later than June 7, 2021.

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.⁸ Further, Ind. Code § 8-1-2.6-13 authorizes the Commission to fulfill its obligations under the Act concerning designation of ETCs.⁹ 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 Jackson County REMC as an ETC within the service areas for which Jackson County REMC will receive 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) of the Act.¹⁰

III. JACKSON COUNTY REMC SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC.

Section 254(e) of the Act provides that “only an eligible telecommunications carrier

public notice.

⁸ 47 USC § 214(e)(2).

⁹ IND. CODE § 8-1-2.6-13.

¹⁰ 47 USC § 214(e)(2).

designated under Section 214(e) of this title shall be eligible to receive specific federal universal support.”¹¹ Section 214(e)(1) of the Act and Section 54.201(d) of the FCC 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.¹² Applications must also commit to advertise the availability and rates of such service.¹³ As set forth below, Jackson County REMC will satisfy each of these requirements.

A. Jackson County REMC Will Be a Common Carrier as Required by 47 CFR § 54.201.

“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. . . .”¹⁴ Jackson County REMC will offer communication services for sale to the public by wire 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. Jackson County REMC Will Provide All Required Services Through a Combination 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, Jackson County 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

¹¹ 47 USC § 254(e).

¹² 47 USC § 214(e)(1); 47 CFR § 54.201(d).

¹³ *Id.*

¹⁴ 47 USC § 153(11).

federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier's services.¹⁵ The voice telephony services required to be provided by Jackson County 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.¹⁶ The broadband access services required to be provided by Jackson County REMC in the designated service areas include 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.¹⁷

In utilizing the allocated RDOF Phase I funding, Jackson County REMC will deliver broadband services high-speed internet access by installing a fiber optic network capable of providing internet access at speeds ranging from 100 Mbps (symmetrical) to 1 Gbps (symmetrical) to both residential and commercial customers. Additionally, upon designation as an ETC, Jackson County 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***

Jackson County REMC will provide voice grade access to the public switched telephone network using its own fiber-based network to resell interconnected VoIP services for which it will contract with a vendor of its choosing that will enable Jackson County REMC to provide

¹⁵ See 47 USC § 214(e)(1)(A); 47 CFR § 54.201(d)(1).

¹⁶ 47 CFR § 54.101(a)(1).

¹⁷ 47 CFR § 54.101(a)(2).

the voice telephony services at the appropriate service levels.

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.¹⁸ The FCC has yet to specify a minimum amount of local usage to be offered by an ETC, but Jackson County 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*

Jackson County 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*

The VoIP service offerings provided by Jackson County REMC will not distinguish between toll and non-toll calls. Accordingly, Jackson County REMC is not required to provide toll limitation services and currently has no plans to offer this service.

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

Pursuant to 47 CFR § 54.101(a)(2), Jackson County 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.¹⁹

¹⁸ 47 CFR § 54.101(a)(1).

¹⁹ 47 CFR § 54.101(a)(2).

C. Jackson County REMC Will Advertise the Availability of Supported Services.

Jackson County REMC 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.²⁰ Specifically, Jackson County REMC will utilize outreach materials and methods designed to reach households that currently do not have telephone service and those likely to qualify for the service. Additionally, Jackson County REMC will coordinate its outreach efforts with relevant government agencies and other local groups. Advertising will include, but not be limited to, targeted direct mail and email, advertisements in monthly Cooperative magazine, billboards and social media advertising. Jackson County REMC will also coordinate with relevant state agencies, community outreach organizations, and non-profit organizations to make information regarding supported service offering available in their respective resource guides, other printed materials and offices. Jackson County REMC will also advertise through online search engines. Jackson County REMC will use the appropriate media outlets to advertise its universal service offerings in a manner consistent with applicable requirements.

For Lifeline services, Jackson County 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 Jackson County 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.

²⁰ See 47 CFR § 54.201(d)(2).

D. Area of Designation as an ETC

Jackson County REMC has attached hereto as **Exhibit A** a map that identifies the specific areas of the state to receive Jackson County REMC's required broadband and voice services pursuant to the RDOF Phase I funding allocated to Jackson County REMC, which areas comprise the area for which Jackson County REMC is seeking ETC designation in this Verified Petition. Specifically, Jackson County REMC's requested service area includes all of the census block groups for which it was allocated RDOF Phase I funding in Auction 904. A list of the census block groups comprising the requested service area is attached hereto as **Exhibit B**. All of Jackson County REMC's requested service area falls within the ILEC study areas of Frontier Communications Corporation and AT&T, Inc., which are not rural telephone companies as that term is defined in 47 CFR § 51.5, and Smithville Telephone Co. and Southeastern Indiana Rural Telephone Cooperative, which are rural telephone companies as that term is 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 an RDOF participant conform to the service area of the rural telephone company serving the same area.²¹ 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."²²

E. Additional Requirements under GAO 2019-5

1. *Submission of five-year plan*

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

²¹Rural Digital Opportunity Fund Order, 35 FCC Rcd 686.

²² *Id.*

Order 2019-5 that ETC applicants file a five-year improvement plan.²³ As an RDOF Phase I funding recipient, Jackson County REMC will provide 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 2019-5, Jackson County REMC maintains the ability to remain functional in emergency situations. Jackson County 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 situations. Jackson County REMC also certifies that its fiber optic network will support telephone service using VoIP technology and will support all phone features, including 911 services. Jackson County REMC can modify network routing and weighting as needed to reroute traffic around damaged facilities. Traffic management capabilities will also allow Jackson County REMC to manage traffic spikes throughout its network, as emergency situations require. Jackson County REMC has established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm or acts of God, including provisions to supply a reasonable amount of emergency power to provide a reasonable amount of battery service at members' premises. Jackson County REMC's network facilities will have off-grid backup power available, as well, from its backup generator system. Therefore, Jackson

²³ General Administrative Order of the Indiana Utility Regulatory Commission 2019-5 (December 27, 2019) ("GAO 2019-5"); *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 (July 10, 2018) ("*Federal ETC Procedural Guidance*"). The Federal ETC Procedural Guidance was released during the CAF Phase II Auction and provided guidance for CAF Phase II recipients seeking federal ETC designation. However, the Federal ETC Procedural Guidance was re-released during the RDOF Phase I Auction, and its justification for waiving the five-year plan requirement remains true with respect to RDOF Phase I recipients. *See* RDOF Phase I (Auction 904) releases: <https://www.fcc.gov/auction/904/releases>.

County REMC's on-site generator will provide network facilities sufficient availability of backup power. This system will ensure functionality without an external power source. In the case of damaged facilities, Jackson County REMC will be able to re-route traffic to circumvent such facilities by utilizing its secondary connections. Jackson County REMC will also maintain adequate capacity to manage traffic spikes from emergency situations. Jackson County REMC has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power in the event of emergency to prevent or mitigate interruption or impairment of telecommunications service. Finally, Jackson County REMC's VoIP services contract arrangement imposes certain obligations on the provider to ensure Jackson County REMC's supported service offering remains functional during emergency situations.

3. *Consumer protection and service quality standards*

Pursuant to GAO 2019-5, ETC applicants are required to demonstrate that they will satisfy applicable consumer protection and service quality standards. Jackson County REMC commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Jackson County REMC will provide a router with a firewall, anti-virus and anti-spam protections and a battery backup for VoIP services if applicable.

F. Designation of Jackson County REMC 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.²⁴ Jackson County 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 Jackson County REMC's services*

Jackson County REMC will use the RDOF Phase I funding that it has been allocated 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 Jackson County 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 Jackson County REMC, providing consumers with additional choices and services at competitive rates.

Because the FCC has already reviewed the Consortium members' proposed service offerings to be provided using RDOF Phase I funding and determined that the members are eligible to receive said funding, there can be no doubt that the FCC considers Jackson County 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 Jackson County 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 allocated to Jackson County REMC through Auction 904 will come directly from the \$20.4 billion set aside by the FCC for RDOF funding. Therefore, Jackson County

²⁴ *Telecommunications Act of 1996*, Pub. LA. No. 104-104, 110 Stat. 56 (1996).

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 Jackson County 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, Jackson County REMC will contribute to the Universal Service Fund based upon the portion of its revenues determined to be interstate. Thus, designating Jackson County REMC as an ETC will create contributions to the Universal Service Fund that were previously nonexistent.

IV. JACKSON COUNTY REMC WILL COMPLY WITH THE LIFELINE CERTIFICATION AND VERIFICATION REQUIREMENTS OF 47 CFR § 54.410.

Pursuant to 47 CFR § 54.405, Jackson County REMC, as an ETC designated in the service area 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 Jackson County REMC's name on all materials describing the Lifeline service. Jackson County 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 Jackson County REMC's website and printed materials.

V. REGULATORY COMMITMENTS

A. Jackson County REMC Will Provide Notice of Changes to the Commission.

As required by the Commission's 1997 ETC Order in Cause No. 41052, Jackson County REMC agrees to notify the Commission in the future upon any change affecting Jackson County REMC's eligibility for ETC designation.

B. Jackson County REMC Will Pay All Applicable Fees.

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

C. Jackson County REMC Will Respond to Future Relinquishment Petitions.

Jackson County REMC hereby certifies that it will respond to any future information requests from the Commission regarding its ability to assume responsibility to serve existing customers of another ETC that operates in Jackson County REMC's designated ETC service area in the event such other ETC relinquishes all or part of its ETC designation.

VI. SERVICE

The names and addresses of Jackson County 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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Aleasha J. Boling (31897-49)
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VII. CONCLUSION

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

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

Respectfully submitted,


By: /s/ Jeremy L. Fetty
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*Attorneys for Jackson County Rural
Electric Membership Corporation*

VERIFICATION

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

Dated: 1-7-2021

By: 
Mark McKinney
President/CEO
Jackson County Rural Electric Membership
Corporation

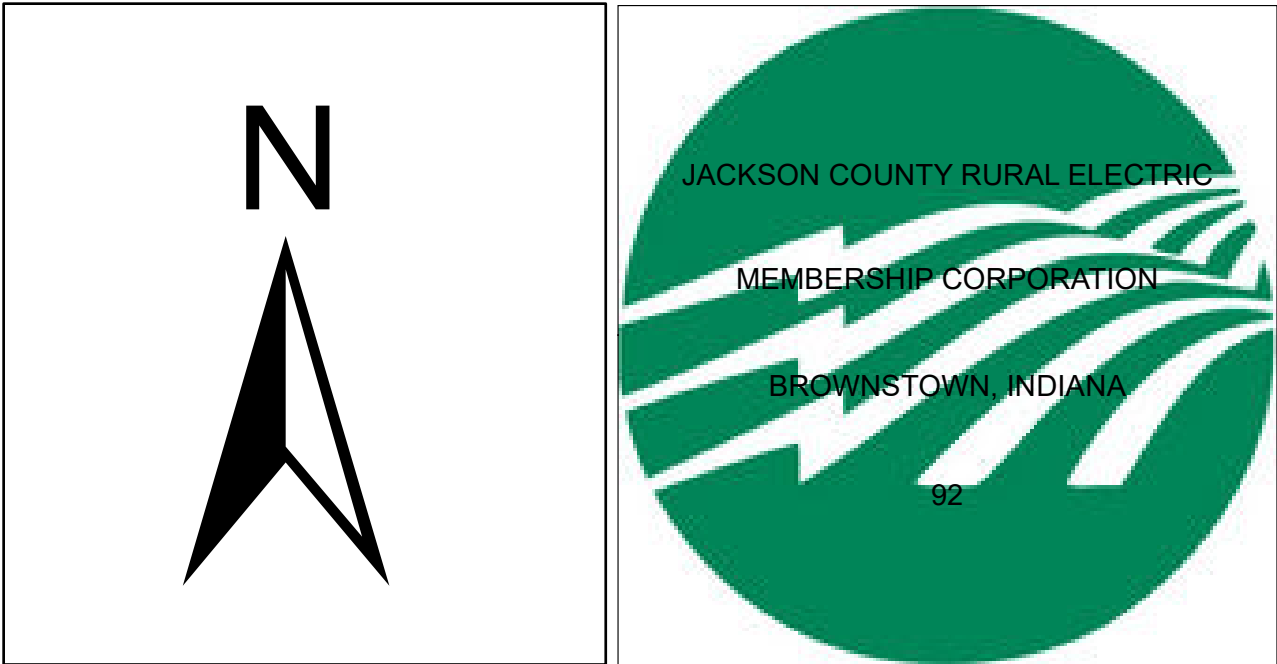
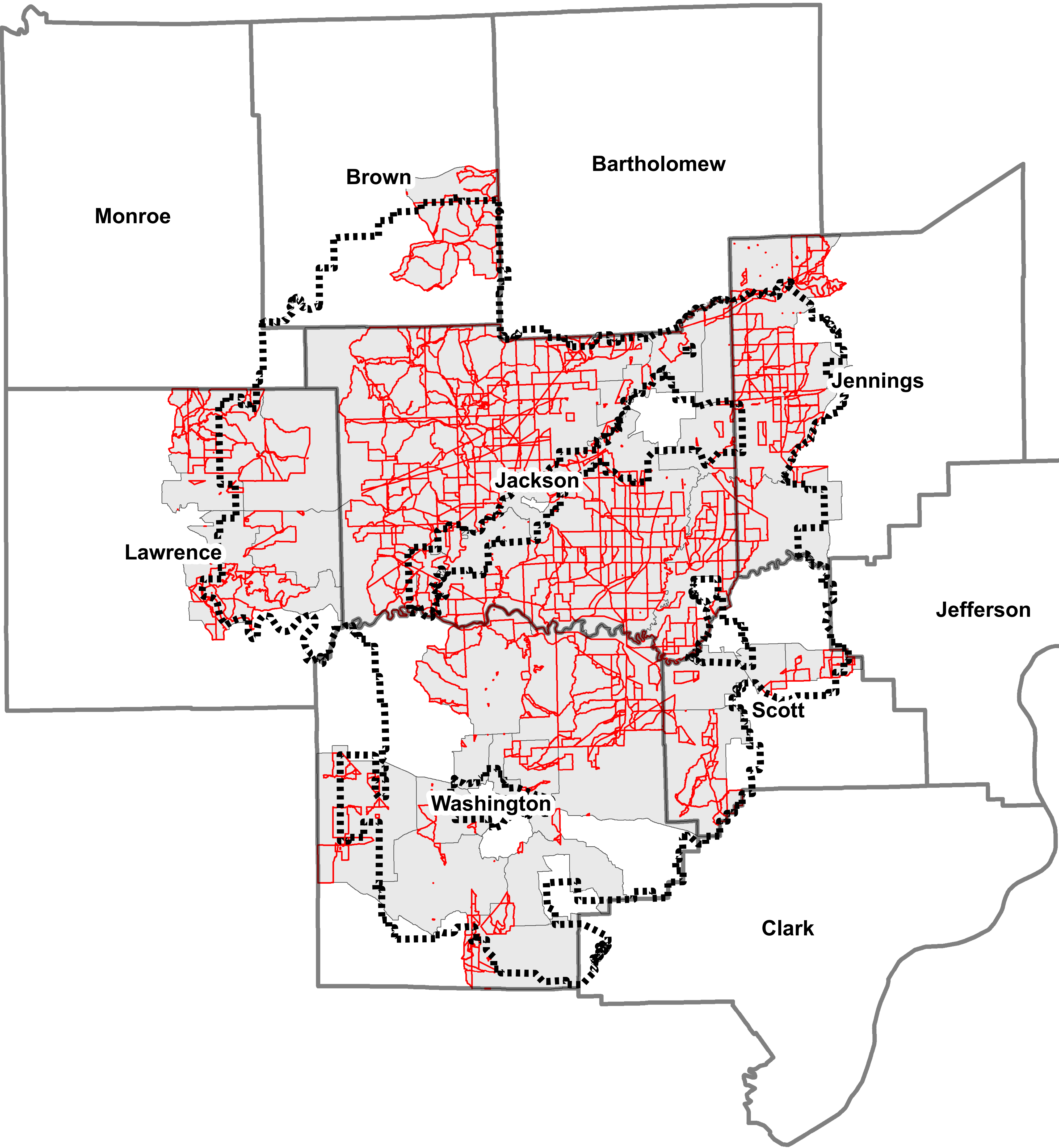
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Verified Petition for Designation as an Eligible Telecommunications Carrier for the Purpose of Receiving Rural Digital Opportunity Fund Phase I Support has been electronically served upon the following this 7th day of January, 2021:


Indiana Office of Utility Consumer Counselor
115 W. Washington Street, Suite 1500 South
Indianapolis, Indiana 46204
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/s/ Jeremy L. Fetty


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Legend

 JCREMC Boundary

 County

 Winning_Census_Blocks

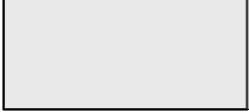
 Winning_Census_Block_Groups

Exhibit B

Awarded Census Block Groups

180719682001	180719683001
181759674002	180719675003
180139749002	180799604002
180719675001	181439669001
181759672001	180799604004
181759672002	180799606004
181759673004	181439667002
181759676002	180719675002
181759677001	180719681001
180719680002	180719675004
180939504003	180719682002
181759674003	181759674001
181759673001	181759676001
180719680001	181439667003
180719680003	180799603012
180719680004	180939505003
180719682003	181759677003
180719682004	180939504002
181439669002	180939512001
180939504001	180939505002
180719683002	