

FILED
March 22, 2021
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE EXPANSION OF)
THE DESIGNATED SERVICE AREA OF)
PERRY SPENCER RURAL TELEPHONE)
COOPERATIVE, INC. AS AN ELIGIBLE)
TELECOMMUNICATIONS CARRIER IN)
THE STATE OF INDIANA)

CAUSE NO. 41052 – ETC 32 S2

IURC
PETITIONER'S
EXHIBIT NO. 3
3-30-21 AT
DOCKET ENTRY REPORTER

PETITIONER'S RESPONSE TO MARCH 17, 2021 DOCKET ENTRY

Perry Spencer Rural Telephone Cooperative, Inc. ("PSRTC" or "Petitioner"), by counsel,
hereby responds to the Indiana Utility Regulatory Commission's March 17, 2021 Docket Entry as
follows:

Request No. 1: Please confirm whether Petitioner will offer voice telephone, broadband,
and Lifeline to the entirety of the Eligible Telecommunications Carrier ("ETC") Expanded
Service Area designated by the 10 census block groups ("CBGs") listed in Exhibit B. If not,
please explain.

Response: Petitioner will offer voice telephony, broadband and Lifeline (if applicable)
services to all qualified customers located only within the 101 census blocks listed on the FCC's
long-form applicant spreadsheet as being awarded to Petitioner. Although Petitioner was awarded
RDOF funding based on 10 census block groups, the 101 census blocks within those 10 groups
are the only areas that will be eligible to actually receive funding and thus are the only areas in
which Petitioner seeks ETC designation and will provide the aforementioned services. Petitioner
has attached hereto an amended Exhibit B to its Verified Petition, which lists the 101 census block
groups in which Petitioner seeks ETC designation. Contemporaneously herewith, Petitioner is
filing in this Cause an Excel spreadsheet listing in a single column the 101 census blocks for
which it was awarded RDOF funding and is seeking ETC designation. Petitioner reserves the
right to refuse service to customers with unsatisfactory credit history in accordance with its
existing policies throughout its existing service territory.

Request No. 2: Specify how many census blocks ("CB") the Federal Communications
Commission's ("FCC") Long-Form Application distributed to Petitioner and explain any conflicts
between that distribution and Petitioner's Expanded Service Area.

Response: Per the FCC's long-form applicant spreadsheet, Petitioner was awarded 101
census blocks to receive RDOF support. Petitioner has attached an amended Exhibit B to the
Verified Petition, which lists the 101 census blocks in which Petitioner seeks ETC designation.
Contemporaneously herewith, Petitioner is filing in this Cause an Excel spreadsheet listing in a

single column the 101 census blocks for which it was awarded RDOF funding and is seeking ETC designation. Based on the amended Exhibit B, Petitioner's Expanded Service Area should consist only of the 101 census blocks listed in that exhibit.

Request No. 3: Indicate whether Petitioner requests ETC designations for the Expanded Service Area at the CB level as funded by the Rural Digital Opportunity Fund ("RDOF") Phase I Auction 904 or at the CBG level. As needed, revise Exhibit B to accurately reflect this request.

Response: Petitioner is requesting ETC designation for the Expanded Service Area on the census block level as funded by Auction 904. An amended Exhibit B to the Verified Petition is attached hereto.

Request No. 4: Please revise the map in Exhibit A to include a legend that explains what the yellow-shaded areas and bright green lines represent and show county lines, if applicable, in the map.

Response: Petitioner has attached hereto a revised Exhibit A to the Verified Petition that contains a legend explaining that the yellow/orange-shaded areas are the RDOF-awarded census blocks and the green lines are county boundaries.

Request No. 5: The direct testimony on page 6 indicates that the Consortium was awarded \$1,186,542.80 in the RDOF Phase I funding over 10 years, the Consortium was the successful bidder for 565 locations in Indiana, and the Consortium participated in the FCC's Divide Winning Bids procedure to allocate to Petitioner \$118,654.28 in RDOF Phase I funding. Please advise regarding the FCC's results for Divide Winning Bids and explain discrepancies, if any, with Petitioner's direct testimony.

Response: As a member of the Rural American Broadband Consortium, Petitioner has been awarded RDOF Phase I support as a winner in Auction 904. The Consortium assigned the winning bids for support in Indiana to Petitioner pursuant to RDOF rules. Petitioner will receive \$118,654.28 annually for 10 years for 565 locations in Indiana, for a total of \$1,186,542.80 in support over 10 years. Thus, there are no discrepancies between the FCC's Divide Winning Bids results and Petitioner's direct testimony.

Request No. 6: Petitioner in direct testimony on page 12 declines to provide a five-year plan pursuant to 47 CFR 54.202(a)(1)(ii) and references FCC guidance provided for the Connect America Fund Phase II Auction in 2018. Please provide a general overview of Petitioner's plans to meet the RDOF milestones and planned network improvements, while not including any confidential information.

Response: Petitioner has a very aggressive time frame (three to five years, depending upon take rate) to complete fiber-to-the-home deployment for the majority of Spencer and Perry County residents, including within the RDOF-funded areas in which Petitioner seeks ETC designation. Within the next year alone, Petitioner will have completed new mainline fiber construction with capacity sufficient to serve virtually all of Spencer County and has already completed that milestone in Perry County. This mainline construction will be a foundational

component for those incremental RDOF areas that were awarded and great simplify and accelerate RDOF deployment well ahead of required milestones. Petitioner is currently installing customers at a pace of roughly 1,200/year and can easily ramp that up if demand exceeds expectations. Petitioner has also been awarded Next Level state funding for 500+ residential locations in neighboring Dubois County, which it will also be constructing within the next two years.

Request No. 7: Please explain whether the voice telephony and broadband services and pricing that will be offered to Petitioner's Expanded Service Area will differ from the voice telephony and broadband services and pricing for such services in either Petitioner's incumbent local exchange carrier service territory or the former expansion approved in Cause No. 41052 ETC 32 S1.

Response: The pricing for internet service offered in the Expanded Service Area will match pricing exactly with what is offered in both Petitioner's CLEC and ILEC territories. Voice telephony will also match exactly what is in Petitioner's CLEC territory and is roughly the same, but not exactly the same, as what is currently offered in its ILEC territory. Within the next couple of months, Petitioner will announce pricing and plan changes in its ILEC area to bring these prices to parity.

Respectfully submitted,

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*Attorneys for Perry Spencer Rural
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petitioner's Response to March 17, 2021 Docket Entry has been electronically served upon the following this 19th day of March, 2021:

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Exhibit A

RDOF Areas Awarded to PSC - Spencer and

Orange shaded areas = RDOF-funded

Green lines = County boundaries

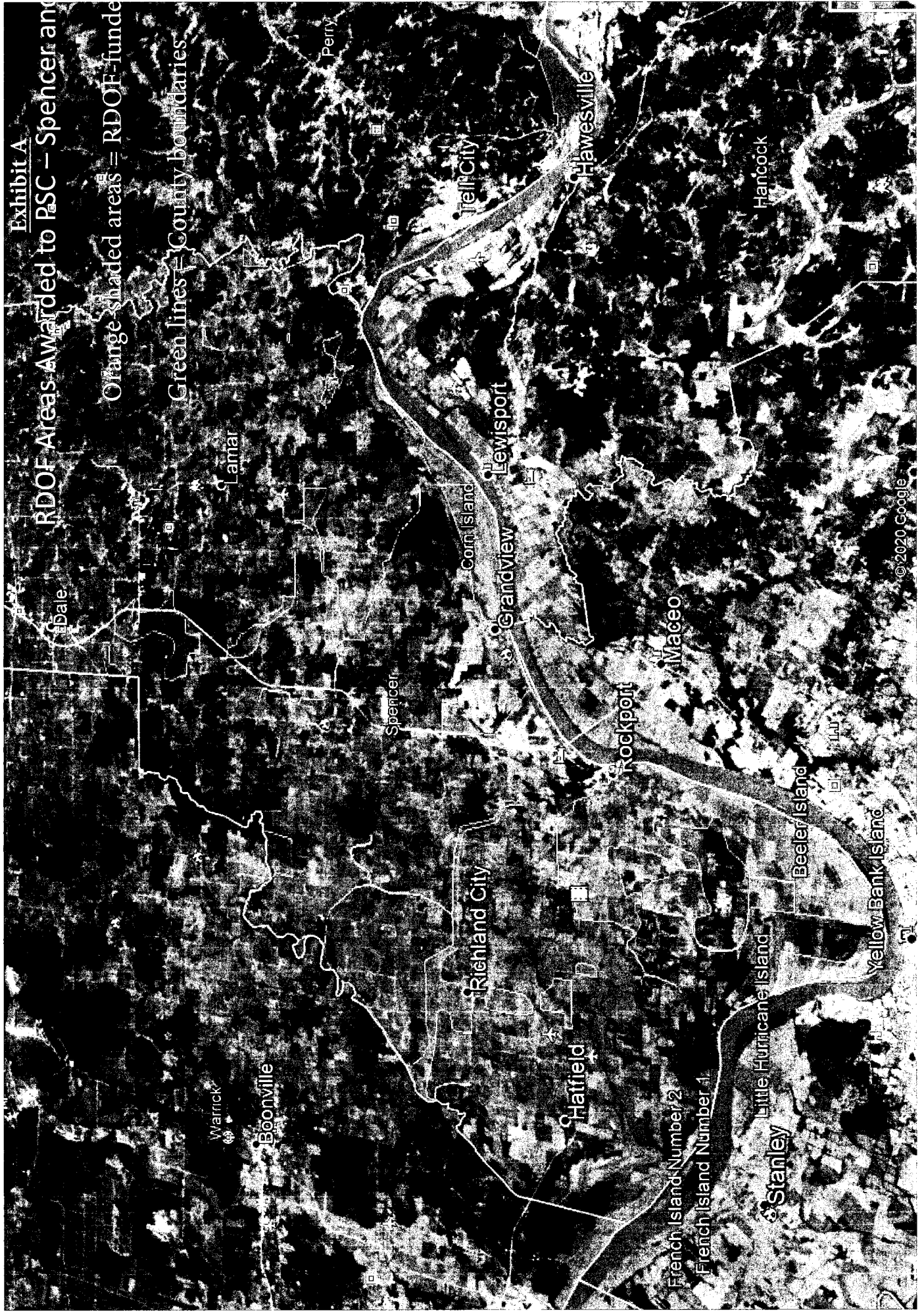


Exhibit B
to Verified Petition
(Amended as of March 19, 2021)

Census Block Number

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181239523001083
181239523001084
181239523001085
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