FILED February 3, 2021 INDIANA UTILITY REGULATORY COMMISSION

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

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IN THE MATTER OF THE EXPANSION OF THE DESIGNATED SERVICE AREA OF DAVIESS-MARTIN COUNTY RURAL TELEPHONE CORPORATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF INDIANA

CAUSE NO. 41052 ETC 30-S1

### VERIFIED PETITION OF DAVIESS-MARTIN COUNTY RURAL TELEPHONE CORPORATION FOR EXPANSION OF DESIGNATED SERVICE AREA AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF INDIANA

Daviess-Martin County Rural Telephone Corporation ("RTC"), 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)(2), 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 that the Indiana Utility Regulatory Commission (the "Commission") approve an expanded service area in which RTC is designated as an eligible telecommunications carrier ("ETC") in the state of Indiana for purposes of receiving federal Rural Digital Opportunity Fund ("RDOF") support in order to expand its high-speed broadband and voice services to unserved rural areas of Indiana. RTC's requested expanded designated service area (the "Expanded Service Area") is identified in **Exhibit A** attached hereto. As demonstrated herein, RTC meets all statutory and regulatory requirements for designation as an ETC in the Expanded Service Area.

Additionally, RTC respectfully requests that the Commission grant this Verified Petition on or before June 7, 2021 to ensure that RTC remains eligible to receive the RDOF support that

it has been awarded through its participation in the FCC's RDOF Phase I auction. In support of this Verified Petition, RTC states as follows:

#### I. BACKGROUND

#### A. Company Overview

RTC is an Indiana rural communications cooperative established under Ind. Code § 8-1-17-1 et seq., which serves as both an incumbent local exchange carrier ("ILEC") and a competitive local exchange carrier ("CLEC") in its authorized service territory. RTC is registered with the Indiana Secretary of State with its principal place of business at 244 N. Main Street, Montgomery, IN 47558. RTC often operates under its registered assumed business names RTC Communications and Intelecyn and will use these assumed business names in marketing and providing services within the Expanded Service Area. On June 2, 1966 in Cause No. 23146, RTC was granted a Certificate of Territorial Authority ("CTA") by the Commission to provide telephone service in all or portions of the Montgomery, Plainville, Alfordsville-Glendale, and Trinity-Williams telephone exchanges in Indiana. On May 2, 1979 in Cause No. 33601, RTC's CTA was expanded to include to remaining areas of these exchanges. On February 3, 2005 in Cause No. 9906-1, RTC's CTA was expanded to include the resale of WATS and/or interexchange service in Indiana. On October 22, 2009 in Cause No. CSP0909-8, RTC's CTA was expanded to include telephone service in zip code 47562, which generally encompasses the town of Odon, Indiana. On June 15, 2015 in Cause No. CSP1505-4, RTC's telephone service area boundaries were revised to add a small portion of Daviess County, Indiana. On November 8, 2018, RTC's CTA was expanded to include telephone service in all exchange service areas held by CenturyLink, TDS, AT&T and Frontier. Finally, on August 15, 2019, RTC's CTA was expanded to include the provision of broadband service in the Montgomery, Plainville,

Alfordsville-Glendale, and Trinity-Williams telephone exchanges. On February 3, 2021, RTC filed a Notice of Change to its CTA to become authorized to provide broadband and interconnected VoIP as a telecommunications service throughout the state of Indiana, which will encompass the Expanded Service Area.

By order approved on December 16, 1997 in Cause No. 41052 ETC 30, the Commission designated RTC as an ETC in its entire ILEC service area, which was comprised of all or parts of Daviess, Lawrence and Martin counties in Indiana. In addition to the Expanded Service Area requested in this Verified Petition, the original designated ETC service area of RTC is identified on the attached **Exhibit A**.

On December 7, 2020, RTC was provisionally awarded RDOF support after participating in the FCC's Auction 904, as further described below. Therefore, RTC hereby requests the Commission approve its Expanded Service Area set forth in <u>Exhibit A</u>, as required for RTC's receipt of these RDOF funds. As further described herein, RTC will offer gigabit broadband and interconnected voice over internet protocol ("VoIP") communications services to the areas identified as the Expanded Service Area and will continue to comply with each of the conditions set forth in the Commission's December 16, 1997 Order in Cause No. 41052 ETC 30.

#### **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 Fun ("CAF") Phase II reverse auction conducted in 2018.<sup>1</sup>

<sup>&</sup>lt;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

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.<sup>2</sup> 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 that are only partially served, as well as census blocks unawarded in the Phase I auction.<sup>3</sup>

RTC 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.<sup>4</sup> On December 7, 2020, the FCC announced the winning bidders of Auction 904, including RTC, which was awarded \$3,565,039.40 in RDOF Phase I funding over 10 years.<sup>5</sup> Following the award of support, RTC 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 awarded during Auction 904.<sup>6</sup> RTC will submit its FCC Form

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).

<sup>&</sup>lt;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").

<sup>&</sup>lt;sup>3</sup> 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").

<sup>&</sup>lt;sup>4</sup> Id.

 <sup>&</sup>lt;sup>5</sup> 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").
<sup>6</sup> Id.

683 application prior to the January 29, 2021 deadline established by the FCC. As part of the long-form application, RTC 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. RTC 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.<sup>7</sup> RTC will not be authorized to received RDOF Phase I support, nor will any such support be released to RTC, 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, RTC respectfully submits this Verified Petition for expansion of its designated service area as an ETC to include the Expanded Service Area identified in <u>Exhibit A</u>. Moreover, given the limited timeframe provided by the FCC for completion of the post-auction obligations, RTC 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 designated by the state commission.<sup>8</sup> Further, Ind. Code § 8-1-2.6-13 authorizes the Commission to fulfill its obligations under the Act concerning designation of ETCs and their service area.<sup>9</sup> Pursuant to this authority, the Commission has historically participated in determining whether to grant ETC status to an applying carrier and in defining such carrier's ETC designated service area. As such, the

<sup>&</sup>lt;sup>7</sup> 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 public notice.

<sup>&</sup>lt;sup>8</sup> 47 USC § 214(e)(2).

<sup>&</sup>lt;sup>9</sup> IND. CODE § 8-1-2.6-13.

Commission has the authority to approve the expansion of RTC's ETC designed service area to include the Expanded Service Area identified in <u>Exhibit A</u>. Under the Act, a state public utility commission with jurisdictional authority over ETC designations must designate a common carrier as an ETC for a particular service area if the carrier satisfies the requirements of Section 214(e)(1) of the Act for such service area.<sup>10</sup>

## III. RTC SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC IN THE EXPANDED SERVICE AREA.

#### A. RTC Has Already Been Designated as an ETC in the State of Indiana.

RTC was designated by the Commission as an ETC on December 16, 1997 in Cause No. 41052 ETC 30. In connection with the Commission's approval of RTC's verified petition for designation as an ETC, the Commission considered the facts and matters set forth in the petition, including information regarding RTC's organization, officers and managerial, financial and technical qualifications. In addition, the Commission reviewed RTC's commitment to providing the required services and to complying with Indiana service quality standards and verification and certification procedures, as well as the FCC's additional eligibility requirements, consumer protection standards and annual reporting requirements. RTC hereby reaffirms its compliance with and commitment to each of the foregoing requirements in both its existing ETC service area and the Expanded Service Area.

Since the Commission has already determined that RTC meets the requirements of an ETC in Indiana, this Verified Petition is limited to whether RTC's designated ETC service area should be expanded to include the Expanded Service Area identified in **Exhibit A**. As demonstrated below, this expansion would serve the public interest, as outlined by the FCC.<sup>11</sup>

<sup>&</sup>lt;sup>10</sup> 47 USC § 214(e)(2).

<sup>&</sup>lt;sup>11</sup> See Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, 20 FCC Red 6371, ¶ 40-43 (March 17, 2005).

#### **B. RTC Will Provide Required Services in the Expanded Service Area.**

Although many of the considerations relevant to RTC's original designation as an ETC remain in effect for this Verified Petition, RTC will provide within this Verified Petition a more detailed description of the services to be offered in the Expanded Service Area. Consistent with the requirements of Section 214(e)(1) of the Act and sections 54.101 through 54.207 of the FCC Rules, RTC 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, specifically its own existing network routers, internet uplinks and internet service provider services.<sup>12</sup> The voice telephony services required to be provided in the Expanded Service Area include voice-grade access to the public switched telephone 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 to qualifying low-income customers.<sup>13</sup> The broadband access services required to be provided in the Expanded Service Area 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.<sup>14</sup>

In utilizing the RDOF Phase I funding in the Expanded Service Area, RTC will deliver broadband services via a fiber-to-the-home ("FTTH") network with symmetrical gigabit speeds. The infrastructure will be designed in a manner that permits RTC to utilize various technologies, such as active ethernet, gigabit passive optical network ("GPON") and other next-generation technologies. For the initial implementation, RTC will deploy GPON technology by leveraging

<sup>&</sup>lt;sup>12</sup> See 47 USC § 214(e)(1)(A); 47 CFR § 54.201(d)(1).

<sup>&</sup>lt;sup>13</sup> 47 CFR § 54.101(a)(1).

<sup>&</sup>lt;sup>14</sup> 47 CFR § 54.101(a)(2).

Calix's GPON management solution and Calix E7-2 modular carrier access switches, which will allow for the delivery of voice and data services across the broadband access platform.

Additionally, upon approval of the Expanded Service Area, RTC will be able to provide the other required services within the Expanded Service Area, including voice grade access to the public switched telephone network using redundant ethernet uplinks from the proposed FTTH electronics to its existing softswitch (Metaswitch) to facilitate voice services. RTC will use redundant ethernet uplinks from the proposed FTTH electronics to its core data network to ensure highly reliable broadband data communication services. Finally, RTC will fulfill its service obligations within the Expanded Service Area by offering: (1) rate plans that offer minutes of use for local service at no additional charge to end users; (2) access to both 911 and enhanced 911 service from local public service answering points; and (3) toll limitation to qualifying low-income customers at no additional charge.

RTC will broadly advertise the availability and rates for the voice telephony and broadband access services to be offered within the Expanded Service Area using media of general distribution as required by Section 54.201(d)(2) of the FCC Rules.<sup>15</sup> Specifically, RTC will advertise the availability and rates for the voice telephony and broadband access services to be offered within the designated Expanded Service Area on its internet website, in printed materials submitted to local agencies serving Lifeline customers, and within its telephone directory.

# C. RTC Will Offer and Advertise the Required Lifeline Services in the Expanded Service Area.

Pursuant to 47 CFR § 54.405, RTC, as an ETC designated in the Expanded Service Area, will: (a) make available Lifeline service, as defined in 47 CFR § 54.401, to qualifying

<sup>&</sup>lt;sup>15</sup> See 47 CFR § 54.201(d)(2).

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 RTC's name on all materials describing the Lifeline service. RTC will publicize Lifeline services in the Expanded 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 service. Guidelines for participation in Lifeline will be available on RTC's website and printed materials.

# IV. APPROVAL OF THE EXPANDED SERVICE AREA 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 location or income.<sup>16</sup> Approval of RTC's Expanded Service Area will offer advantages to rural customers within the Expanded Service Area and will not have a negative impact on the Universal Service Fund.

## A. Approval of RTC's Expanded Service Area Will Offer Advantages to Rural Customers.

RTC will use the RDOF Phase I funding that it has been 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

<sup>&</sup>lt;sup>16</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

provide critical connectivity to residents and businesses in the Expanded Service Area that lack access to such services. Further, the availability of RTC's voice and broadband services will promote economic growth in rural Indiana communities by providing necessary infrastructure and will promote increased competition within the Expanded Service Area, providing consumers with additional choices and services at competitive rates.

The FCC has already reviewed RTC's proposed service offerings to be provided using RDOF Phase I funding and determined that it is eligible to receive said funding. Additionally, the Commission has already determined that RTC should be designated as an ETC in the state of Indiana. Based on the foregoing, there can be no doubt that the FCC and Commission consider RTC's provision of 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 approval of RTC's Expanded Service Area will allow for the provisionally approved project to move forward, such designation will promote the public interest.

## **B.** Approval of RTC's Expanded Service Area Will Not Have a Negative Impact on the Universal Service Fund.

The funds awarded to RTC through Auction 904 will come directly from the \$20.4 billion set aside by the FCC for RDOF funding. Therefore, RTC's use of the Universal Service Fund for the provision of the services described herein in the Expanded Service Area 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 RTC 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, RTC will contribute to the Universal Service Fund based upon the portion of its revenues determined to be interstate. Thus, designating RTC as an ETC in the Expanded Service Area will create contributions to the Universal Service Fund that were previously nonexistent.

#### V. ADDITIONAL REQUIREMENTS UNDER GAO 2019-5

#### A. Identification of Expanded Service Area.

RTC has attached hereto as **Exhibit A** a map that identifies the specific areas of the state to receive RTC's required broadband and voice services pursuant to the RDOF Phase I funding awarded to RTC, which areas comprise the Expanded Service Area that is the subject of this Verified Petition. Specifically, RTC's Expanded Service Area includes all of the census block groups for which it was awarded RDOF Phase I funding in Auction 904. A list of the census block groups comprising the Expanded Service Area is attached hereto as **Exhibit B**. All of the awarded census block groups are within the ILEC study areas of CenturyTel of Odon (Study Area Code 320801), Indiana Bell Telephone Co. (Study Area Code 325080) and Frontier North, Inc. (Study Area Code 320779), which are not rural telephone companies as defined in 47 CFR § 51.5. Thus, RTC'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.

#### **B.** Submission of Five-Year Plan.

In accordance with the ETC designation requirements applicable to winning bidders in Auction 904 adopted by the FCC, RTC requests that, to the extent necessary, the Commission waive the requirement contained in the Commission's General Administrative Order 2019-5

that ETC applicants file a five-year improvement plan.<sup>17</sup> As an RDOF Phase I funding recipient, RTC will provide to the FCC audited financials, cost estimates and descriptions of proposed improvements to its network throughout the proposed service area.

#### C. Ability to Remain Functional in Emergency Situations.

In accordance with GAO 2019-5, RTC maintains the ability to remain functional in emergency situations. RTC 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. To aid in the reliability of services, RTC provides the customer with an offering of a battery backup for the optical network terminals in their homes. RTC also has standby generators at all major equipment node locations to power the equipment for extended periods.

#### **D.** 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. RTC commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. For example, RTC has policies in place regarding customer proprietary network information to protect the privacy of its customers.

#### E. RTC Will Provide Notice of Changes to the Commission.

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

<sup>&</sup>lt;sup>17</sup> 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.

designation.

### F. RTC Will Pay All Applicable Fees.

As a part of its application for approval of the Expanded Service Area, RTC agrees to

pay all fees applicable to ETCs as required by law.

### G. RTC Will Respond to Future Relinquishment Petitions.

RTC 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 RTC's Expanded Service Area in the event such other ETC

relinquishes all or part of its ETC designation.

## VI. SERVICE

The names and addresses of RTC's counsel authorized to be served with all pleadings,

discovery, docket entries, orders and documents relevant to this Cause are:

James A.L. Buddenbaum (14511-49) Aleasha J. Boling (31897-49) PARR RICHEY FRANDSEN PATTERSON KRUSE LLP 251 N. Illinois Street, Suite 1800 Indianapolis, Indiana 46204 Telephone: (317) 269-2500 Facsimile: (317) 269-2514 Email: jbudenbaum@parrlaw.com aboling@parrlaw.com

## VII. CONCLUSION

Having demonstrated that this Verified Petition satisfies the public and universal service interests of the telecommunications consumers of the state of Indiana, RTC respectfully requests that the Commission approve this Verified Petition for the purpose of expanding RTC's designated ETC service area to include the Expanded Service Area identified in **Exhibit A**.

Respectfully submitted,

By: <u>/s/ James A.L. Buddenbaum</u> James A.L. Buddenbaum (14511-49) Aleasha J. Boling (31897-49) PARR RICHEY FRANDSEN PATTERSON KRUSE LLP 251 N. Illinois Street, Suite 1800 Indianapolis, IN 46204 Telephone: (317) 269-2500 Facsimile: (317) 269-2514 E-mail: jbuddenbaum@parrlaw.com

> Attorneys for Daviess-Martin County Rural Telephone Corporation

## **VERIFICATION**

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

Dated: 2-2-21

By:

1.

Kirk Lehman Chief Executive Officer/Executive Vice President Daviess-Martin County Rural Telephone Corporation

#### **CERTIFICATE OF SERVICE**

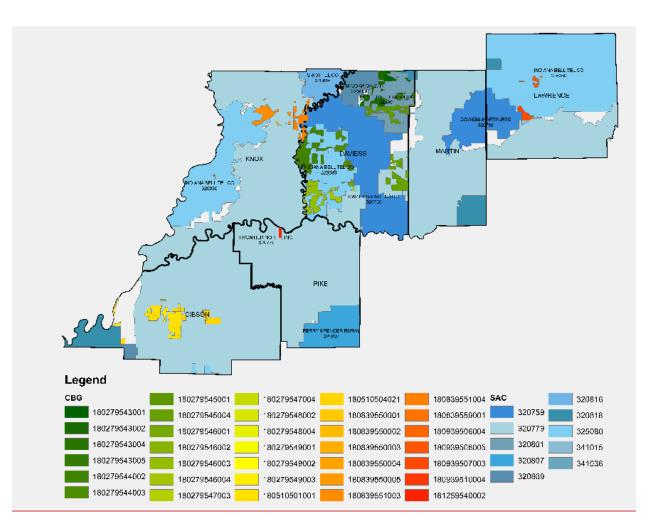
I hereby certify that a copy of the foregoing Verified Petition of Daviess-Martin County Rural Telephone Corporation for Expansion of Designated Service Area as an Eligible Telecommunications Carrier in the State of Indiana has been electronically served upon the following this 3rd day of February, 2021:

Indiana Office of Utility Consumer Counselor 115 W. Washington Street, Suite 1500 South Indianapolis, Indiana 46204 infomgt@oucc.in.gov

> /s/ James A.L. Buddenbaum James A.L. Buddenbaum (14511-49) PARR RICHEY FRANDSEN PATTERSON KRUSE LLP 251 N. Illinois Street, Suite 1800 Indianapolis, Indiana 46204 Telephone: (317) 269-2500 Facsimile: (317) 269-2514 Email: jbuddenbaum@parrlaw.com

## Exhibit A

## **Expanded Service Area**



## <u>Exhibit B</u>

## Awarded Census Block Groups

			<b>RDOF Funding</b>	
Locations	CBG	County		10-Year
25	180279546001	Daviess	\$	45,636
149	180279546003	Daviess	\$	294,684
64	180279546004	Daviess	\$	66,672
31	180279543001	Daviess	\$	138,550
67	180279543002	Daviess	\$	434,370
33	180279543004	Daviess	\$	31,487
2	180279543005	Daviess	\$	6,318
134	180279544002	Daviess	\$	315,951
1	180279546002	Daviess	\$	1,530
2	180279547003	Daviess	\$	6,378
1	180279547004	Daviess	\$	4,248
1	180279548002	Daviess	\$	1,686
2	180279548004	Daviess	\$	5,040
9	180279549001	Daviess	\$	7,134
3	180279549002	Daviess	\$	636
4	180279549003	Daviess	\$	3,204
47	180279544003	Daviess	\$	126,078
182	180279545001	Daviess	\$	194,641
82	180279545004	Daviess	\$	138,085
219	180510501001	Gibson	\$	924,831
69	180510504021	Gibson	\$	261,556
3	180839550001	Knox	\$	1,872
6	180839550002	Knox	\$	1,224
3	180839550003	Knox	\$	9,534
3	180839550004	Knox	\$	4,080
1	180839550005	Knox	\$	426
56	180839551003	Knox	\$	175,191
65	180839551004	Knox	\$	173,898
6	180839559001	Knox	\$	6,672
73	180939507003	Lawrence		130,521
1	180939506004	Lawrence	\$ \$	1,002
20	180939506005	Lawrence	\$	37,344
3	180939510004	Lawrence	\$	2,112
4	181259540002	Pike	\$	12,447
1371	34		\$	3,565,039