

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE PETITION OF)
RTC COMMUNICATIONS CORP. FOR)
DESIGNATION AS AN ELIGIBLE) CAUSE NO. 41052-ETC 93
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**

RTC Communications Corp. (“RTCCC”), 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 RTCCC 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, RTCCC meets all statutory and regulatory requirements for designation as an ETC in the state of Indiana.

Additionally, RTCCC respectfully requests that the Commission grant this Verified Petition on or before June 7, 2021 to ensure that RTCCC remains eligible to receive the RDOF support that it has been allocated through its participation in the Co-Op Connections Consortium (the “Consortium”), a winner in the FCC’s RDOF Phase I auction. In support of this Verified Petition, RTCCC states as follows:

I. BACKGROUND

A. Company Overview

RTCCC is an Indiana corporation organized under Ind. Code § 23-1-1-1 *et seq.* and registered with the Indiana Secretary of State with its principle place of business at 117 W. 8th Street, P.O. Box 507, Rochester, Indiana 46975. RTCCC has registered assumed business names of RTC Long Distance, RTC On Line, RTC and RTC TV. On December 9, 1998 in Cause No. 41281, the Commission granted RTCCC a certificate of territorial authority (“CTA”) to provide competitive local exchange service throughout the state of Indiana by using its own facilities and by resale of bundled local exchange service from other providers. On July 25, 2009 in Cause No. CSP0906-5, the Commission officially acknowledged a change to the authorized services provided by RTCCC under its CTA to include video service, broadband service, internet protocol-enabled services and advanced services. In this Cause, the Commission specifically acknowledged RTCCC’s authority to provide broadband, internet protocol-enabled and advanced services in the City of Rochester and Town of Akron and to provide wireless broadband service in the towns of Macy, Fulton, Kewanna and Mentone. On January 6, 2021, RTCCC filed a Notice of Change to its CTA to add broadband service and interconnected VoIP as a telecommunications service throughout the entire state of Indiana, which will encompass all of RTCCC’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 RTCCC. Therefore, RTCCC 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, RTCCC will offer broadband and voice telephony services at required service levels to the areas specified in its RDOF Phase I award.

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 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

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*”).

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*”).

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 RTCCC for a total of \$78,006 in RDOF Phase I funding over 10 years.⁵ Following the allocation of support, RTCCC 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 RTCCC 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, RTCCC 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. RTCCC 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 RTCCC will not be authorized to receive RDOF Phase I support, nor will any such support be released to RTCCC, if it does not obtain the appropriate ETC designation.

Therefore, in order to fulfil its post-auction obligations for receipt of RDOF Phase I support, RTCCC 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

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 public notice.

timeframe provided by the FCC for completion of the post-auction obligations, RTCCC 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 RTCCC as an ETC within the service areas for which RTCCC 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. RTCCC SATISFIES THE REQUIREMENTS FOR DESIGNATION AS AN ETC.

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under Section 214(e) of this title shall be eligible to receive specific federal universal support.”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, RTCCC will satisfy each of these requirements.

⁸ 47 USC § 214(e)(2).

⁹ IND. CODE § 8-1-2.6-13.

¹⁰ 47 USC § 214(e)(2).

¹¹ 47 USC § 254(e).

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

¹³ *Id.*

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

Consistent with the requirements of Section 214(e)(1) of the Act and sections 54.101 through 54.207 of the FCC Rules, RTCCC will provide all services required in order to be eligible for high-cost universal service support in the state of Indiana using its own facilities and, if necessary, through resale of another carrier’s services, allowing it to meet the FCC’s requirement that an ETC provide certain voice telephony services that are supported by federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier’s services.¹⁵ The voice telephony services required to be provided by RTCCC 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 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

¹⁴ 47 USC § 153(11).

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

¹⁶ 47 CFR § 54.101(a)(1).

incidental to and enable the operation of the communications service, but excluding dial-up service.¹⁷

In utilizing the awarded RDOF Phase I funding, RTCCC will deliver broadband services via a fiber-to-the-premises (FTTP) network which will be designed in a manner that permits RTCCCC to utilize various technologies such as active ethernet, gigabit passive optical network (“GPON”), ten gigabit (XGS-PON) passive optical network or various other next-generation technologies. Additionally, upon designation as an ETC, RTCCC 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.***

RTCCC will provide voice grade access to the public switched telephone network using a class 5 unified communications IP digital switch (Metaswitch) with geo-diversely redundant capabilities.

- 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 RTCCC 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.***

RTCCC will provide access to emergency services for its customers in the requested

¹⁷ 47 CFR § 54.101(a)(2).

¹⁸ 47 CFR § 54.101(a)(1).

ETC service area, including access to both 911 and enhanced 911 service from local public service answering points.

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

Toll limitation means both toll blocking and toll control, or if a carrier is not capable of providing both toll blocking and toll control, then toll limitation is defined as either toll blocking or toll control. RTCCC will offer toll limitation to qualifying low-income customers within its designated ETC service area at no additional charge.

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

Pursuant to 47 CFR § 54.101(a)(2), RTCCC 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

C. *RTCCC Will Advertise the Availability of Supported Services.*

RTCCC 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, RTCCC will advertise its services via newspaper, mail circulars and radio and will target residential customers with its advertising efforts.

For Lifeline services, RTCCC 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 RTCCC's name, that the service is a Lifeline service, that it

¹⁹ 47 CFR § 54.101(a)(2).

²⁰ See 47 CFR § 54.201(d)(2).

is a government assistance program, that the service is non-transferable, and that it is available only to eligible consumers and limited to one discount per household.

D. Area of Designation as an ETC.

RTCCC has attached hereto as **Exhibit A** a map that identifies the specific areas of the state to receive RTCCC's required broadband and voice services pursuant to the RDOF Phase I funding allocated to RTCCC, which areas comprise the area for which RTCCC is seeking ETC designation in this Verified Petition. Specifically, RTCCC's requested service area includes all of the census blocks for which it was allocated RDOF Phase I funding in Auction 904. A list of the census blocks comprising the requested service area is attached hereto as **Exhibit B**. All of RTCCC's requested service area falls within the ILEC study area of CenturyLink, Inc. (Study Area Code 320832), which is not a rural telephone company, as that term is defined in 47 CFR § 51.5. Thus, RTCCC's request is not subject to the additional requirements of 47 CFR § 54.207(b)-(d) related to the redefinition of a rural telephone company's study area for a competing carrier's ETC designation.

E. Additional Requirements under GAO 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, RTCCC 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.²¹ As an RDOF Phase I

²¹ 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

funding recipient, RTCCC 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, RTCCC maintains the ability to remain functional in emergency situations. RTCCC 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. Specifically, RTCCC complies with industry standard battery power for “off hook” or runtime capability to power its equipment for seven to eight hours. In addition, RTCCC’s main facility is equipped with a natural gas generator capable of powering all equipment necessary in standalone emergency situations. Customers are advised when provided a sip phone that adequate backup is suggested for their POE (Power Over Ethernet) switches or individual backup per powered phone. All services fed through the optical network are offered with an optional battery backed up ONT (Optical Network Terminal) with up to eight hours of capacity. RTCCC has planned redundant backbone transport fiber routes capable of rerouting traffic around damaged data center facilities. RTCCC monitors facilities 24/7. All backbone facilities have battery and/or generator backup power.

Additionally, RTCCC is capable of managing traffic spikes that could result during emergency situations. The transport and core networks provide 10G data paths and the access network is GPON (1G passive optical network). Intelligent Fiber Network (IFN) supplies internet connectivity through a redundant ring/dual path topology. RTCCC closely monitors purchased internet access bandwidth to allow extra capacity for emergency situations.

3. *Consumer protection and service quality standards.*

(Auction 904) releases: <https://www.fcc.gov/auction/904/releases>.

Pursuant to GAO 2019-5, ETC applicants are required to demonstrate that they will satisfy applicable consumer protection and service quality standards. RTCCC commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, RTCCC's service quality and consumer protection standards and policies can be found at www.RTC1.com.

F. Designation of RTCCC 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.²² RTCCC'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 RTCCC's services.

RTCCC 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 RTCCC'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 RTCCC, 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

²² *Telecommunications Act of 1996*, Pub. LA. No. 104-104, 110 Stat. 56 (1996).

eligible to receive said funding, there can be no doubt that the FCC considers RTCCC'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 RTCCC 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 RTCCC through Auction 904 will come directly from the \$20.4 billion set aside by the FCC for RDOF funding. Therefore, RTCCC'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 RTCCC 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, RTCCC will contribute to the Universal Service Fund based upon the portion of its revenues determined to be interstate. Thus, designating RTCCC as an ETC will create contributions to the Universal Service Fund that were previously nonexistent.

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

Pursuant to 47 CFR § 54.405, RTCCC, 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 RTCCC's name on all materials describing the Lifeline service. RTCCC 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 RTCCC's website and printed materials.

V. REGULATORY COMMITMENTS

A. RTCCC Will Provide Notice of Changes to the Commission.

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

B. RTCCC Will Pay All Applicable Fees.

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

C. RTCCC Will Respond to Future Relinquishment Petitions.

RTCCC 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 RTCCC'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 RTCCC's counsel authorized to be served with all pleadings, discovery, docket entries, orders and documents relevant to this Cause are:

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VII. CONCLUSION

Based on the foregoing, designation of RTCCC 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, RTCCC respectfully requests that the Commission promptly designate RTCCC as an ETC in the state of Indiana with respect to the service areas identified in **Exhibit A** and **Exhibit B**.

Respectfully submitted,

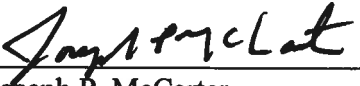
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VERIFICATION

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

Dated: 1-6-2021

By: 
Joseph P. McCarter
President
RTCCC Communications Corp.

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 6th day of January, 2021:

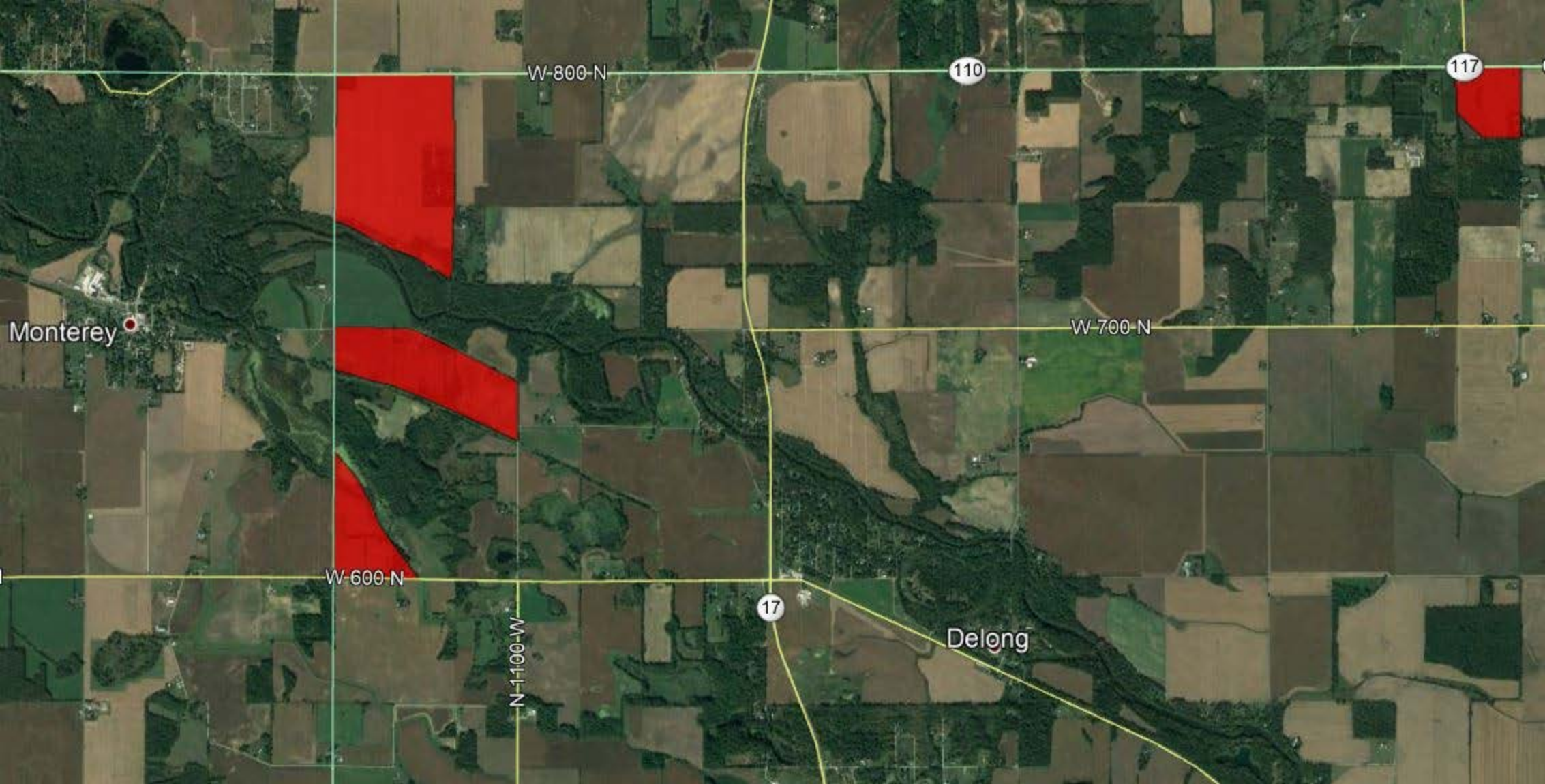
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Exhibit A

Designated Service Area



W-800-N

110

117

Monterey

W-700-N

W-600-N

N-1-100-W

17

Delong

Exhibit B

Awarded Census Block Groups

CBG 180499532003

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