

OFFICIAL
EXHIBIT 3

FILED
April 12, 2021
INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

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

IURC
PETITIONER'S

EXHIBIT NO. 3
4-16-21 DATE REPORTER AT

PETITIONER'S RESPONSE TO APRIL 7, 2021 DOCKET ENTRY REQUESTS

Daviess-Martin County Rural Telephone Corporation ("Petitioner" or "Daviess-Martin"),
by counsel, hereby responds to the Indiana Utility Regulatory Commission's April 7, 2021
Docket Entry Requests.

1. Please identify any other companies or entities (either affiliated or unaffiliated) with which Petitioner is partnering, or intends to partner, in offering or providing supported services in Indiana, including the specific services covered under Daviess-Martin's provisional award of Federal Communications Commission ("FCC") Rural Digital Opportunity Fund ("RDOF") Phase I support. If applicable, please explain whether each partner is an affiliate or subsidiary of Petitioner or an unaffiliated entity.

RESPONSE: *DAVIESS-MARTIN is not partnering, nor intends to partner, with other companies or entities in its offering or support of the specific services covered under the provisional FCC RDOF award.*

2. Please identify the minimum actual downstream and upstream broadband speeds, the monthly broadband usage allowances, and the latency commitment that Daviess-Martin will offer to fulfill its RDOF commitments to the FCC.

RESPONSE: *DAVIESS-MARTIN is subject to meet the provisional tier as determined through the RDOF Auction bidding process. In this case, DAVIESS-MARTIN filed to provide Gigabit with latency of less than 100ms. DAVIESS-MARTIN is capable of offering synchronous upstream/downstream speeds of up to 1Gbps with currently deployed 2.5Ghz GPON technology. Many of our plans are symmetrical in nature, however our current Gigabit service offering provides upload/download speeds at 1Gbps/100Mbps and is restricted on the upload due to market needs determination and not due to lack of technology support.*

3. Please affirm that Petitioner will offer all the required RDOF services to all eligible residential and small business customers and to all high cost/RDOF non-Lifeline subscribers and Lifeline subscribers throughout the proposed Eligible Telecommunications Carrier (“ETC”) designation area at rates that are reasonably comparable to rates in urban areas for similar services.

RESPONSE: *DAVIESS-MARTIN Affirms this statement.*

4. Please explain the following:

a. Whether Daviess-Martin will distinguish between local and non-local (i.e., toll) minutes:

b. Whether Daviess-Martin’s Lifeline subscribers will have their local exchange service disconnected for non-payment of toll charges;

c. Whether Daviess-Martin will require its Lifeline subscribers to pay any additional charges for toll calls, and, if so, please explain the charges;

d. Whether and how Daviess-Martin will offer Lifeline subscriber credits for both voice telephony-broadband bundles and for voice-telephony-only service, as well as the dollar amounts of those credits and the associated terms and conditions (e.g., broadband speeds and usage allowances) and the expiration date (if any) for the credits; and

e. Whether Daviess-Martin will offer toll blocking and/or toll control to its Lifeline subscribers.

RESPONSE:

a. *DAVIESS-MARTIN VoIP product offering includes unlimited local and long distance within the U.S. 50 state area and does not distinguish between local and non-local minutes of use.*

b. *Pursuant to 4a, non-payment of toll charges will not be a reason for disconnection.*

c. *Pursuant to 4a, no additional charges for toll calls would be incurred by the Lifeline subscriber.*

- d. *DAVISS-MARTIN currently offers Lifeline within its existing ETC ILEC areas. Lifeline credits are subject to subscriber eligibility. Eligibility is determined via subscriber application through the FCC National Verifier. Upon confirmation of eligibility, DAVISS-MARTIN will apply the appropriate Lifeline discount to the subscribers monthly billing.*

The FCC determines the actual credits available to the subscriber under the Lifeline program and the reforms made in the 2016 Lifeline Modernization Order. These can be found on the FCC Lifeline website: [Lifeline Program for Low-Income Consumers | Federal Communications Commission \(fcc.gov\)](http://www.fcc.gov/lifeline).

Sample table from the site shows the following schedule of credits:

Date	Mobile Voice	Mobile Broadband	Fixed Broadband	Voice Support Amount (Per Month)	Broadband Support Amount (Per Month)
December 1, 2016*	500 Minutes	Speed: 3G	Speed: 10/1***	\$9.25	\$9.25
		Usage Allowance: 500 MB	Usage Allowance: 150 GB		
1-Dec-17	750 Minutes	Speed: 3G	Speed: 15/2***	\$9.25	\$9.25
		Usage Allowance: 1 GB	Usage Allowance: 250 GB		
1-Dec-18	1000 Minutes	Speed: 3G or Bureau Determination	Speed: 18/2	\$9.25	\$9.25
		Usage Allowance: 2 GB	Usage Allowance: 1000 GB		
1-Dec-19	1000 Minutes	Speed: 3G or Bureau Determination	Speed: 20/3	\$7.25	\$9.25
		Usage Allowance: 3 GB	Usage Allowance: 1024 GB		
1-Dec-20	1000 Minutes	Speed: 3G or Bureau Determination	Speed: Mechanism	\$5.25	\$9.25
		Usage Allowance: Updating Mechanism	Usage Allowance: CAF Standard or Bureau Determination		
1-Dec-21	1000 Minutes**	Speed: 3G or Bureau Determination	Speed: Mechanism	\$0**	\$9.25
		Usage Allowance: Updating Mechanism	Usage Allowance: CAF Standard or Bureau Determination		

* Minimum service standards and support amounts will be implemented on the later of December 1, 2016 or 60 days after PRA approval.

** Continued voice support of \$5.25 per month in areas with only one Lifeline provider.

*** Fixed broadband providers that do not offer a product meeting the minimum service standards to a particular customer's residence may receive the \$9.25 benefit if that customer purchases a fixed broadband offering that meets or exceeds 4 Mbps download and 1 Mbps upload.

- e. *In the event toll blocking or toll control is required, such as international call blocking; DAVISS-MARTIN currently offers that at no charge to Lifeline subscribers.*

5. Please state whether Petitioner requests an ETC designation at the census block level or at the census block group level.

RESPONSE: *DAVISS-MARTIN originally requested ETC designation at the census block group level based on the Auction 904 award process. Based on the request under 6a and 6b, we have provided the census block list. DAVISS-MARTIN has no specific preference on the basis of the ETC designation.*

6. Consistent with the Commission's General Administrative Order ("GAO") 2019- 5, Item # 6, please provide the following documents:

a. An amended version of Exhibit B to the Verified Petition to show all census blocks that were allocated to it by the FCC and for which Petitioner is seeking ETC designation from this Commission;

b. An Excel spreadsheet, listing, in a single column, all census blocks for which Daviess-Martin is seeking ETC designation, filed separately; and

c. An amended version of Exhibit A to the Verified Petition that will identify the 10 companies in whose Study Areas Petitioner is seeking ETC designation, show all census block boundaries for the census blocks included in Petitioner's ETC designation request, and will be otherwise consistent with the amended Exhibit B.

RESPONSE:

a. *DAVIESS-MARTIN has complied, see attached amended Exhibit B.*

b. *DAVIESS-MARTIN has complied, see attached Excel Spreadsheet file named "DAVIESS-MARTIN 6b Single Column Census Blocks"*

c. *Additional information in support of Exhibit A is included with this response; provided, however, that Exhibit A already identifies the Study Area companies.*

7. Please confirm that Petitioner will offer a stand-alone voice telephony telecommunications service to all eligible residential and small business customers that will not require the customer to also subscribe to a broadband offering. Please provide the rates and number of minutes for this offering.

RESPONSE: *DAVIESS-MARTIN confirms the offering of a standalone voice telephony telecommunications server to all eligible residential and small business customer that does not require a broadband subscription offering.*

8. Daviess-Martin requests a waiver of the requirement to file a five-year improvement plan. In lieu of filing a five-year improvement plan, please provide more information regarding Petitioner's plan to provide the supported voice and broadband services to its proposed designated service area. As part of this response, please provide more information on how Daviess- Martin plans to meet the FCC's RDOF buildout timeline.

RESPONSE: *DAVIESS-MARTIN follows the Project Management Institutes guidelines and industry recommendations within our internal project management organization.*

As shown in the figure below, RTC will meet the goals as established by the FCC within the RDOF rulemaking. In partial year one (end of 2021), RTC will have achieve ~8% completion, year two (end of 2022) ~27%, year three (end of 2023) ~48%, year four (end of 2024) ~84% and finally in year five (2025) 100%.

RDOF PROJECT PLAN - SUMMARIZED DETAIL - SORTED BY COMPLETION DATE																
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
FACILITY ID	CBG	County	RDOF Locations	Passes	Passes	Total Locations	Fiber Mile	Start of Construction	Duration (d)	End of Construction	End Year	RDOF % Complete	Network State	Network Mileage	Buried Mileage @ 40%	Aerial Mileage @ 60%
WASHINXAAN1	180279549002	Daviess	3	0	3	24	01/01/2021	1	01/02/2021	2021	0.22%	Existing	0.12	0.048	0.072	
WASHINXAANO	180279548004	Daviess	2	0	2	24	01/01/2021	3	01/05/2021	2021	0.36%	Existing	0.4	0.16	0.24	
WASHINXCANO	180279547003	Daviess	2	0	2	24	01/01/2021	4	01/06/2021	2021	0.51%	Existing	0.5	0.2	0.3	
WASHINXDANO	180279549003	Daviess	4	0	4	24	01/01/2021	4	01/06/2021	2021	0.80%	Existing	0.5	0.2	0.3	
WASHINXAAN1	180279548002	Daviess	1	0	1	24	01/01/2021	4	01/07/2021	2021	0.88%	Existing	0.6	0.24	0.36	
WASHINXCANO	180279546002	Daviess	1	0	1	24	01/01/2021	4	01/07/2021	2021	0.95%	Existing	0.6	0.24	0.36	
WASHINXAAN1	180279549001	Daviess	9	0	9	24	01/01/2021	6	01/09/2021	2021	1.60%	Existing	0.8	0.32	0.48	
WASHINXCANO	180279547004	Daviess	1	0	1	24	01/01/2021	6	01/09/2021	2021	1.68%	Existing	0.8	0.32	0.48	
WASHINXDANO	180279546001	Daviess	25	30	55	24	07/01/2021	27	08/06/2021	2021	3.50%	Expansion	3.59	1.436	2.154	
WASHINXDANO	180279546004	Daviess	64	14	78	24	07/01/2021	74	10/11/2021	2021	8.17%	Expansion	9.95	3.98	5.97	
WASHINXEANO	180279546003	Daviess	149	25	174	24	07/01/2021	193	03/27/2022	2022	19.04%	Expansion	26.17	10.468	15.702	
ODONINXAANO	180279543005	Knox	2	0	2	24	06/01/2022	21	06/30/2022	2022	19.18%	Expansion	2.83	1.132	1.698	
ODONINXAANO	180279543001	Daviess	31	49	80	24	06/01/2022	50	08/09/2022	2022	21.44%	Expansion	6.72	2.688	4.032	
WASHINXAAN1	180279544003	Daviess	47	58	105	24	01/01/2022	199	10/05/2022	2022	24.87%	Expansion	26.98	10.792	16.188	
ODONINXAANO	180279543004	Knox	33	62	95	24	06/01/2022	134	12/04/2022	2022	27.28%	Expansion	18.11	7.244	10.866	
WASHINXBANO	180279544002	Daviess	134	51	185	24	01/01/2022	358	05/14/2023	2023	37.05%	Expansion	48.39	19.356	29.034	
BCKNINXAANO	180839550004	Knox	3	0	3	24	06/01/2023	2	06/04/2023	2023	37.27%	Expansion	0.33	0.132	0.198	
BCKNINXAANO	180839550003	Knox	3	0	3	24	06/01/2023	6	06/08/2023	2023	37.49%	Expansion	0.75	0.3	0.45	
BCKNINXAANO	180839550005	Knox	1	0	1	24	06/01/2023	7	06/10/2023	2023	37.56%	Expansion	0.9	0.36	0.54	
BCKNINXAANO	180839550001	Knox	3	0	3	24	06/01/2023	11	06/16/2023	2023	37.78%	Expansion	1.5	0.6	0.9	
BCKNINXAANO	180839550002	Knox	6	0	6	24	06/01/2023	16	06/23/2023	2023	38.22%	Expansion	2.2	0.88	1.32	
ODONINXAANO	180279543002	Daviess	67	53	120	24	06/01/2022	294	07/15/2023	2023	43.11%	Expansion	39.81	15.924	23.886	
BCKNINXAANO	180839551004	Knox	65	75	140	24	06/01/2023	98	10/15/2023	2023	47.85%	Expansion	13.21	5.284	7.926	
VINCINXAANO	180839559001	Knox	6	0	6	24	01/01/2024	4	01/06/2024	2024	48.29%	Expansion	0.5	0.2	0.3	
BCKNINXAANO	180839551003	Knox	56	88	144	24	06/01/2023	161	01/11/2024	2024	52.37%	Expansion	21.77	8.708	13.062	
BDFRINXAANO	180939506004	Lawrence	1	0	1	24	01/01/2024	19	01/27/2024	2024	52.44%	Expansion	2.6	1.04	1.56	
BDFRINXAANO	180939510004	Lawrence	3	0	3	24	01/01/2024	26	02/06/2024	2024	52.66%	Expansion	3.5	1.4	2.1	
ODONINXAANO	180279545001	Daviess	182	79	261	24	06/01/2022	444	02/09/2024	2024	65.94%	Expansion	60.11	24.044	36.066	
BDFRINXAANO	180939506005	Lawrence	20	0	20	24	01/01/2024	56	03/18/2024	2024	67.40%	Expansion	7.56	3.024	4.536	
LOGTINXAANO	180279545004	Daviess	82	24	106	24	03/01/2023	305	04/29/2024	2024	73.38%	Expansion	41.31	16.524	24.786	
BDFRINXAANO	180939507003	Lawrence	73	34	107	24	01/01/2024	111	06/04/2024	2024	78.70%	Expansion	15.06	6.024	9.036	
PTBGINXAANO	181259540002	Pike	4	32	36	24	06/01/2024	39	07/25/2024	2024	78.99%	Expansion	5.33	2.132	3.198	
PRTNINXAANO	180510504021	Gibson	69	17	86	24	06/01/2024	112	11/04/2024	2024	84.03%	Expansion	15.19	6.076	9.114	
PRTNINXAANO	180510501001	Gibson	219	30	249	24	06/01/2024	230	04/17/2025	2025	100.00%	Expansion	31.17	12.468	18.702	
Total			1371	721	2092									409.86		

9. Please describe the specific consumer protections and service quality standards that will be implemented for Daviess-Martin's voice telephony telecommunications service customers in Indiana.

RESPONSE: Petitioner will implement all FCC service quality and consumer protections applicable to VoIP service, including, but not limited to, local number portability rules, limits on the use and disclosure of CPNI, 911 service requirements, and 711 abbreviated dialing for access to relay services. In addition, Petitioner will implement all voice subscriber consumer rights and protections required by Ind. Code ch. 8-1-29 and 170 IAC § 7-1.3, including those relating to unauthorized switching of providers or billing for services, confirmation of preferred carrier change order, notice of proposed rate changes, and compliance with billing requirements. In addition, pursuant to Ind. Code ch. 8-1-29 and 170 IAC 7-1.3-9, voice subscribers will have the ability to bring complaints forward to the Commission. Petitioner's consumer protections and service quality standard operating procedures for its voice customers will be the same as those in place for its broadband customers, given that voice service will be provided over Petitioner's broadband network. Petitioner will use separate

virtual local area networks (“VLANs”) for the provision of VoIP service, which means that VoIP traffic will have separate routes from broadband services in order to ensure that VoIP services remain uninterrupted and will not be impacted by other broadband traffic. This prevents spillage from occurring into either core network. Service quality for both voice and broadband service will be ensured via 24/7/365 network operations monitoring and equipment failure alerts. Response time to equipment failure within the control of Petitioner will be within 24 hours. Transport fiber response time may be up to 48 hours.

10. Please confirm that Petitioner will be the entity responsible for dealing with problems experienced by its retail voice over IP (“VoIP”) and voice telephony customers in Indiana, and that it will provide quality of service guarantees and other consumer protections to its end user voice customers. Please provide copies of and/or links to any such guarantees and protections.

RESPONSE: *DAVIESS-MARTIN confirms this statement and has provided links to our published information.*

Privacy Policy | DAVIESS-MARTIN (Daviess-Martincom.com)

TERMS AND CONDITIONS | DAVIESS-MARTIN (Daviess-Martincom.com)

Open-Internet-Policy-V01.pdf (Daviess-Martincom.com)

Respectfully submitted,

By: /s/James A.L. Buddenbaum
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: jbuddenbaum@parrlaw.com
aboling@parrlaw.com

*Attorneys for Daviess-Martin County
Rural Telephone Corporation*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Petitioner's Response to April 7, 2021 Docket Entry Requests has been electronically served upon the following this 12th day of April, 2021:

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

Jennifer L. Schuster, Administrative Law Judge
jschuster@urc.in.gov

By: /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

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