



September 28, 2018

Via Electronic Filing

Secretary to the Commission
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
Harrisburg, PA 17120

Re: Armstrong Telecommunications Inc. Application for Designation as an Eligible Telecommunications Carrier

Dear Secretary:

On behalf of Armstrong Telecommunications, Inc., (ATI) we have attached for filing the Application for Designation as an Eligible Telecommunications Carrier pursuant to Pennsylvania State Public Service Commission requirements. ATI seeks ETC designation in the State of Pennsylvania as an FCC Auction 903 Recipient. ATI satisfies all the statutory and regulatory requirements for designation as an ETC in the requested designated service area. As explained in the attached petition, the public interest would be served by granting this petition. As an FCC Auction 903 Recipient, the Company is in a 180-day approval window and does request that the Department expeditiously review and approve this application for designation as an ETC.

Sincerely,

/s/ Jesse Taylor
Jesse Taylor
Telecommunications Analyst
Phone: (605) 995-1819
Fax: (605) 995-1778
Jesse.Taylor@Vantagepnt.com

Enclosure(s)

cc: Shawn Beqaj, Vice President of Regulatory, Armstrong Telecommunications, Inc.

**STATE OF PENNSYLVANIA
DEPARTMENT OF PUBLIC SERVICE**

APPLICATION OF ARMSTRONG)
TELECOMMUNICATOINS, INC.)
FOR DESIGNATION AS AN) CASE NO: _____
ELIGIBLE TELECOMMUNICATIONS)
CARRIER)

**APPLICATION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

COMES NOW Armstrong Telecommunications, Inc. (Armstrong or the Company) and makes application to the State of Pennsylvania Department of Public Service (Department) for designation as an eligible telecommunications carrier (ETC). This application is made pursuant to 47 U.S.C. § 214(e)(1)-(2) and the rules and regulations of the Department. The Company requests ETC designation throughout the CAF II census blocks it was awarded in the areas of Mercer, Crawford, and Erie County, Pennsylvania.

The Company seeks ETC designation in the State of Pennsylvania as an FCC Auction 903 Recipient. The Company satisfies all of the statutory and regulatory requirements for designation as an ETC in the requested designated service area. As explained herein, the public interest would be served by granting this petition. As an FCC Auction 903 Recipient, the Company is in a 180-day approval window and does request that the Department expeditiously approve this application for designation as an ETC.

I. Background

Armstrong Telecommunications, Inc. was granted a certificate of Incorporation by the Department of State on July 11, 2000. On October 25, 2001 Armstrong Telecommunications, Inc. was approved to begin to offer, render, furnish, and supply telecommunication services as a reseller of interexchange toll services, to the public, in the commonwealth of Pennsylvania.

All inquiries concerning this application should be made to:

Shawn Beqaj
Vice President

One Armstrong Place
Butler, PA 16001
(724) 256-8092
sbeqaj@agoc.com

Upon designation as an ETC, the Company will provide the supported services throughout the requested designated service area and offer Lifeline and Link-Up service to qualified low-income consumers.

II. Authority for Designation of an ETC

Title 47 U.S.C. § 214(e)(2) of the Act provides that a state commission shall upon request designate a common carrier as an eligible telecommunications carrier (ETC) for a service area designated by the state commission. Title 47 U.S.C. § 214(e)(1) provides that an ETC shall be eligible to receive universal service support in accordance with section 254 of the Act and shall, in the service area for which the designation is received, offer the services that are supported by federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services, and shall advertise the availability of such services and their costs using media of general distribution. The Federal Communications Commission has promulgated a list of the services or functionalities that shall be supported by federal universal service support mechanisms at 47 C.F.R. § 54.101.

III. The Company is a Common Carrier

The Company is a common carrier as defined in the Communications Act of 1934, as amended.

IV. The Company Shall Offer Required Services

Pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(d)(1), the Company shall, throughout the service area for which designation is received, offer the services that are supported by Federal universal service support mechanisms defined in 47 C.F.R. § 54.101(a). These services are: 1) voice grade access to the public switched network; 2) local usage; 3) dual tone multi-frequency signaling or its functional equivalent; 4) single-party service or its functional equivalent; 5) access to emergency services; 6) access to operator services; 7) access to interexchange service; 8) access

to directory assistance; and 9) toll limitation for qualifying low-income consumers. Armstrong can and will provide all these required services.

V. The Company Shall Use Its Own Facilities, Or a Combination of Its Own Facilities and Resale of Another Carrier's Services

Pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(d)(1), the Company shall use primarily its own facilities, but at times may resell another carrier's services to offer the services that are supported by Federal universal service support mechanisms. Armstrong is a facilities-based carrier and again will primarily use its own state of art facilities to provide any requested services.

VI. The Company Shall Provide Service Throughout the Designated Service Area

Pursuant to 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d), the Company shall offer the services that are supported by Federal universal service support mechanisms throughout the service area for which designation is received. In addition, the Company commits to provide service throughout its proposed designated service area to all customers making a reasonable request for service. The Company certifies that it will provide service on a timely basis to requesting customers within the Company's service area where the Company's network already passes the potential customer's premises. See 47 C.F.R. § 54.202(a)(1)(i). The Company certifies that it will provide service within a reasonable period of time and within its CAF II buildout requirements, if the potential customer is within the Company's ETC service area but outside its existing network coverage, if service can be provided at reasonable cost by: 1) modifying, adjusting or replacing network or customer facilities; or 2) reselling services from another carrier's facilities to provide service. See 47 C.F.R. § 54.202(a)(1)(i).

VII. The Company Will Advertise

Pursuant to 47 U.S.C. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2), the Company shall advertise the availability of the services that are supported by Federal universal service support mechanisms and the charges for such services using media of general distribution. The Company may advertise,

among other means, via newspaper, mail circular, and radio and target residential customers with its advertising efforts.

VIII. The Company Shall Make Available Lifeline Service

Pursuant to 47 C.F.R. § 54.405, the Company shall make available Lifeline service to qualifying low-income consumers and publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. The Company will make a concerted effort to notify municipal, state, and federal governmental agencies whose clientele may likely benefit the most from having the Company designated as an ETC by the Commission. In addition, the Company may advertise, among other means, via newspaper, mail circular, and radio and target residential customers with its advertising efforts.

IX. Service Area for Which Designation Is Requested

The Company requests ETC designation in the CAF II census blocks it was awarded in the areas of Mercer, Crawford, and Erie County, Pennsylvania.

X. Emergency Situations

Pursuant to 47 C.F.R. § 54.202(a)(2), a carrier seeking ETC designation must demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

The Company has a reasonable amount of back-up power to ensure functionality of voice services without a commercial power source. The company's specific back-up power sources are, lead calcium batteries, gel cell batteries, fixed AC and DC natural/LP gas generators, fixed AC and DC gasoline/diesel generators and portable gasoline generators. The Company is able to reroute voice traffic around damaged facilities and is capable of managing traffic spikes resulting from emergency situations. If there is a failure of the Company's main route, voice traffic is automatically rerouted to a back-up route.

XI. Consumer Protection and Service Quality Standards

Pursuant to 47 C.F.R. § 54.202(a)(3), a carrier seeking ETC designation must demonstrate that it will satisfy applicable consumer protection and service quality standards. The Company commits to comply with all applicable Department and FCC rules concerning consumer protection and service quality.

XII. Designation of the Company as an ETC Is in the Public Interest

Designation of the Company as an ETC would be in the public interest. Competition furthers the goals of telecommunications service and provides the consumer with a greater choice of providers and service choices, which will in turn result in market-driven prices and quality. The Company is not requesting designation in any rural areas (rural as defined by the statutes of 47 USC §54.201(c)). Granting the Company ETC status would advance principles of customer service by providing increased competition and is therefore in the public interest.

The designation of the Company as an ETC will offer Lifeline-eligible customers a greater choice of providers for accessing telecommunications services not available to such customers today and should likely expand participation of qualifying customers in the Lifeline program. Last, the Company is an FCC Auction 903 awardee who will build out unserved and underserved areas under the FCC CAF II program and this designation is required under that program, all of which is in the public interest.

XIII. 5-Year Plan

Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a carrier seeking ETC designation must submit a five-year plan that describes proposed improvements or upgrades to the Company's network. As an FCC Auction 903 Recipient, the Company provided audited financials, cost estimates broken down by the service area, key assumptions that described with specificity proposed improvements or upgrades to the applicant's network over the buildout period throughout its proposed service area. Armstrong is financially viable to provide the services herein.

XIV. Consumer Certification

Consistent with 47 C.F.R. § 54.409, the Company shall verify that the consumer receives benefits under an approved assistance program or that the consumers' household meets applicable income requirements; and that the consumer will notify the Company if the consumer ceases participation

in a program or his income criteria exceeds approved thresholds. The Company shall obtain this certification annually and shall put in place quality control mechanisms to ensure that only eligible consumers are participating in Lifeline and that the consumer or no one in its household receives duplicate lifeline benefits.

XV. Annual Reporting Requirements

The Company shall comply with all annual reporting requirements for designated ETCs as applicable.

XVI. Conclusion

WHEREFORE, the Company respectfully requests designation as an ETC for all the purposes listed above. As an FCC Auction 903 Recipient, The Company is in a 180-day approval window and does request that the Department expeditiously' review and approve this application for designation as an ETC. Shawn Beqaj's Affidavit can be found in Exhibit B.

Respectfully submitted,



Shawn Beqaj
Vice President of Regulatory
One Armstrong Place
Butler, PA 16001
(724) 256-8092

EXHIBIT A

LIST OF CENSUS BLOCKS IN WHICH ARMSTRONG TELECOMMUNICATIONS, INC.

SEEKS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

Census Blocks	Block Groups	County
420391105011010	420391105011	Crawford
420391105011035	420391105011	Crawford
420391106002000	420391106002	Crawford
420391106002004	420391106002	Crawford
420391108003027	420391108003	Crawford
420391108004053	420391108004	Crawford
420391120011041	420391120011	Crawford
420391120022077	420391120022	Crawford
420490103012034	420490103012	Erie
420490103012035	420490103012	Erie
420490103012036	420490103012	Erie
420490103012041	420490103012	Erie
420490103012042	420490103012	Erie
420490103012044	420490103012	Erie
420490112014004	420490112014	Erie
420490112014013	420490112014	Erie
420490112014015	420490112014	Erie
420490112014019	420490112014	Erie
420490112014027	420490112014	Erie
420490112014030	420490112014	Erie
420490112014031	420490112014	Erie
420490112014034	420490112014	Erie
420490112014035	420490112014	Erie
420490112014036	420490112014	Erie
420490112014037	420490112014	Erie
420490112014039	420490112014	Erie
420490112014042	420490112014	Erie
420490112014043	420490112014	Erie
420490112014045	420490112014	Erie
420490112014046	420490112014	Erie
420490112014047	420490112014	Erie
420490112014048	420490112014	Erie
420490112014049	420490112014	Erie
420490115071021	420490115071	Erie
420490115071022	420490115071	Erie
420490115071024	420490115071	Erie
420490115071025	420490115071	Erie
420490117021019	420490117021	Erie
420490117021022	420490117021	Erie
420490117021023	420490117021	Erie
420490117021027	420490117021	Erie
420490117021028	420490117021	Erie
420490117021029	420490117021	Erie
420490117021033	420490117021	Erie
420490117024000	420490117024	Erie
420490117024001	420490117024	Erie

420490117024003	420490117024	Erie
420490117024004	420490117024	Erie
420490117024005	420490117024	Erie
420490117024006	420490117024	Erie
420490117024009	420490117024	Erie
420490117024013	420490117024	Erie
420490117024028	420490117024	Erie
420490117024039	420490117024	Erie
420490117024041	420490117024	Erie
420490117025000	420490117025	Erie
420490117025002	420490117025	Erie
420490117025006	420490117025	Erie
420490117025007	420490117025	Erie
420490117025015	420490117025	Erie
420490117025016	420490117025	Erie
420490117025017	420490117025	Erie
420490117025018	420490117025	Erie
420490117025019	420490117025	Erie
420490117025023	420490117025	Erie
420490117025028	420490117025	Erie
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420490117025032	420490117025	Erie
420490117025035	420490117025	Erie
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420490118011004	420490118011	Erie
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420490118011036	420490118011	Erie
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420490118013010	420490118013	Erie
420490118013011	420490118013	Erie
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420490118013017	420490118013	Erie
420490118013019	420490118013	Erie
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420490118013033	420490118013	Erie
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420490121002024	420490121002	Erie
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420490122013018	420490122013	Erie
420490122013019	420490122013	Erie
420490122013033	420490122013	Erie
420850318002034	420850318002	Mercer
420850318002045	420850318002	Mercer
420850318003139	420850318003	Mercer
420850318003141	420850318003	Mercer
420850318004004	420850318004	Mercer

EXHIBIT B

AFFIDAVIT OF SHAWN BEQAJ

VICE PRESIDENT OF REGULATORY, ARMSTRONG TELECOMMUNICATIONS, INC.

AFFIDAVIT OF SHAWN BEQAJ

COMMONWEALTH OF PENNSYLVANIA

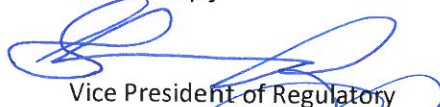
) SS.

COUNTY OF BUTLER

Shawn Beqaj, after being duly sworn, states the following:

1. I have personal knowledge of the facts and information set fourth in this Affidavit and I am competent to testify to these facts if called as a witness.
2. I am the Vice President of Regulatory of Armstrong Telecommunications, Inc. and I have read the Petition to which this Affidavit is attached. I have knowledge of the facts stated in the Petition and those facts are true to the best of my knowledge and my belief.
3. Armstrong Telecommunications, Inc. certifies that it is a common carrier under sections 214(e)(1) and 214(e)(6) of the Communications Act of 1943 ("Act").
4. Armstrong commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier in the Census Blocks described in the Petition.
5. Armstrong certifies that it will meet all the Commission's requirements for designation as an ETC under section 214(e)(6) of the Act.
6. I am the corporate officer that will be responsible for certifying Armstrong's use of federal high-cost support.
7. Armstrong will use the federal high-cost support that it receives only to provide, construct, upgrade, and maintain facilities and services for which the support is intended.
8. Armstrong certifies that neither it nor any party to is application is subject to a denial of federal benefits, including Commission benefits, pursuant to section 5301 of the Ant-Drug Abuse Act of 1988, as implementation in section 1.2002 of the Commission's rules.

Shawn Beqaj


Vice President of Regulatory
Armstrong Telecommunications, Inc.

NOTARY

State of Pennsylvania

County of Butler

This record was acknowledged before me on 9-28-18 (date)

By Shawn Beqaj (name(s) of individual(s)).

Notary signature Kelly D. Chapman

Stamp: My Commission expires: 7-30-22

