

BCS Review of Armstrong Telecommunications , Inc.  
Application for Designation as an Eligible Telecommunication Carrier  
P-2018-3005035

In addition to the information provided in Armstrong Telecommunications Petition for Designation as an Eligible Telecommunications Carrier at P-2018-3005035, please respond to the following questions and requests with as much detail as is available to avoid delay in processing the petition.

LIFELINE

1. Upon obtaining designation as an Eligible Telecommunications Carrier (ETC), when does ATI anticipate beginning to offer Lifeline?

Response:

ATI will begin offering Lifeline service immediately upon obtaining ETC status.

2. At this time, Pennsylvania ETCs determine eligibility for Lifeline and recertify subscribers. When Pennsylvania becomes active with the National Lifeline Accountability Database (NLAD) ATI must enroll with NLAD and follow program rules and requirements regarding enrollment, recertification, de-enrollment, reporting, etc. Does ATI have dedicated staff for this purpose?

Response:

Yes, ATI has the dedicated staff to enroll with NLAD and follow program rules and requirements regarding enrollment, recertification, de-enrollment, reporting, etc.

3. How will ATI accept Lifeline applications?

Response:

Pennsylvania recently launched as a National Verifier state. ATI will provide customers with paper applications or assist customers in the local office to complete the online National Verifier application in order to accept Lifeline applications.

4. Under what circumstance will ATI require a security deposit from Lifeline applicants? Please provide a copy of ATI's written procedures for determining the credit status of an applicant.

Response:

ATI does not require a security deposit.

5. Please submit a copy of ATI's Lifeline compliance plan to the Commission upon approval by the FCC.

Response:

ATI is not required to file a Lifeline Compliance Plan with the FCC. However, ATI will comply with the FCC Lifeline rules, including it will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for this service. Further, ATI will indicate on all materials describing the service, using easily understood language, that it is a Lifeline service, that Lifeline is a government assistance program, the service is non-transferable, only eligible consumers may enroll in the program, and the program is limited to one discount per household.

6. Will ATI waive any fees for Lifeline subscribers (i.e. porting, installation)? If so, which fees?

Response:

No. Although ATI does not typically charge fees such as porting and installation, any fees that ATI charges will not be waived for Lifeline subscribers.

7. Please provide a list of all charges/fees that Lifeline applicants or subscribers will be charged to subscribe to Lifeline.

Response:

- Zoom up to 100 Mbps down and 10 Mbps up for \$53.70 a month (\$62.95 retail less \$9.25)
- Telephone unlimited local and long distance with over 12 features for \$30.70 a month (\$39.95 retail less \$9.25)
- Bundled Zoom and Telephone for \$93.65 a month (\$102.92 retail less \$9.25)

8. What are the minimum voice/data standards that ATI will provide to Lifeline subscribers?

Response:

- Zoom up to 100 Mbps down and 10 Mbps up with 1 TB data cap.
- Wireline telephone with unlimited local and long distance.

9. ETCs are required to submit an annual Lifeline Tracking Report due June 30, reporting for the prior calendar year. The report is submitted via a website portal. Staff from the PUC's Bureau of Consumer Services (BCS) will reach out to establish access to the portal. Please provide contact information for staff responsible for preparing/submitting reports to the Commission.

Response:

David Ames  
One Armstrong Place  
Butler, PA 16001  
dames@agoc.com

724-283-0925 ext 50385

10. Please provide contact information that is to appear on the Commission's publication, *Stay Connected* that is linked here -  
<http://www.puc.pa.gov/Telecom/pdf/Lifeline%20Brochure-StayConnected.pdf>

Response:

Erie and Crawford County  
Armstrong Telephone  
160 Westview Drive  
Meadville, PA 16335  
814-333-6731

Mercer County  
Armstrong Telephone  
123 Industrial Drive  
Grove City, PA 16127  
814-458-7165

ADVERTISEMENT / MARKETING

1. Please provide a mock-up of advertisement/marketing materials for English and non-English speakers that describe the service options and packages with pricing available to Lifeline subscribers. Indicate if offerings could be different within or between exchanges.

Response:

ATI will offer the lifeline discount on the retail packages available, please refer to Exhibit A for marketing material. Offerings will not be different within or between exchanges.

2. In addition to advertising the availability of supported services and relevant charges using media of general distribution, ATI is to provide the Pennsylvania Department of Human Services (PA DHS) with Lifeline service descriptions/marketing material, subscription forms, contact information, and a listing of service areas to the following centralized contact.

Response:

Frank Slenker, Human Services Program Specialist Supervisor (HSPSS)  
Department of Human Services, OIM Bureau of Policy  
1006 Hemlock Drive  
Harrisburg, PA 17110  
Phone: 717-705-8292

- Please ascertain that ATI will inform both the BCS and DHS of any changes and/or updates to service offerings.

Response:

ATI will inform both the BCS and DHS of any changes and/or updates to service offerings.

3. In addition to the BCS and PA DHS, please identify what other municipal, state, and federal government agencies that ATI will make a concerted effort to notify that ATI offers Lifeline service? For example, subsidized housing offices, food banks, etc.? (VIII.)

Response:

ATI will make bi-annual bill inserts and newspaper notices, and maintain information posted on our website. At this point we do not plan on making additional notifications.

4. Please provide a mock-up of information about the availability of Lifeline services that will be provided to prospective customers who seek to subscribe to local exchange service.  
66 P.S. § 3019(f)(3)

Response:

See Armstrong Offers Lifeline Service web page.

<http://armstrongonewire.com/Support/Billing/Articles/SpecialServices>

5. Please provide a mock-up of information about the availability of Lifeline services that will be provided as a conspicuous bill insert message to existing customers. 3019(f)(4)

Response:

See Exhibit A discussing bill insert, newspaper notices, and website notice information.

6. Please include the following statement on all marketing material:
  - *If you have an unresolved question or complaint about Lifeline service, please contact the Pennsylvania Public Utility Commission Bureau of Consumer Services at 1-800-692-7380.*

Response:

ATI will include the above state on all marketing material.

EQUIPMENT

1. To achieve full functionality of voice and/or data services, what are the compatibility specifications that customer-owned equipment must meet? How will this be disclosed to customers?

Response:

Voice = a corded or cordless phone with Caller ID capability and additional backup power supply/battery should the customer want telephone service in the event of a power outage

beyond the 8 hours of standby back up battery Armstrong supplies at install. Fully disclosed at install and on our website in Master Terms and Telephone Subscription Agreement.  
Internet = A PC or MAC meeting the minimum system requirements found here:  
<http://armstrongonewire.com/Support/Internet/Articles/Requirements>.

2. Please provide mockup of how ATI will disclose to customers the functionality, warranty, and maintenance of battery back-up installed with the optical network terminal (ONT) or equivalent.

Response:

ATI Fully discloses functionality, warranty, and maintenance of battery back-up at install and on ATI's website in Master Terms and Telephone Subscription Agreement. We could also add an article here: <http://armstrongonewire.com/Support/Telephone/Articles/Index>.

GENERAL

1. Please provide a list of ATI's local calling exchanges throughout the CAF II census blocks as awarded in the areas of Mercer, Crawford and Erie Counties in Pennsylvania.

Crawford	ILEC in Crawford	Erie	ILEC in Erie	Mercer	ILEC in Mercer
CAMBDG SPG	0169 VERIZON NORTH INC.-PA	EDINBORO	0169 VERIZON NORTH INC.-PA	BLACKTOWN	0209 UNITED TEL CO. OF PENNSYLVANIA DBA CENTURYLINK
COCHRANTON	0176 WINDSTREAM PENNSYLVANIA, INC.	ERIE	0169 VERIZON NORTH INC.-PA	COCHRANTON	0176 WINDSTREAM PENNSYLVANIA, INC.
CONNEAUTLK	0176 WINDSTREAM PENNSYLVANIA, INC.	FAIRVIEW	0169 VERIZON NORTH INC.-PA	FREDONIA	0176 WINDSTREAM PENNSYLVANIA, INC.
CONNEAUTVL	0176 WINDSTREAM PENNSYLVANIA, INC.	GIRARD	0169 VERIZON NORTH INC.-PA	GREENVILLE	9208 VERIZON PENNSYLVANIA, INC.
GUYS MILLS	0176 WINDSTREAM PENNSYLVANIA, INC.	MCKEAN	0169 VERIZON NORTH INC.-PA	GROVE CITY	9208 VERIZON PENNSYLVANIA, INC.
JAMESTOWN	0176 WINDSTREAM PENNSYLVANIA, INC.	NORTH EAST	0169 VERIZON NORTH INC.-PA	JAMESTOWN	0176 WINDSTREAM PENNSYLVANIA, INC.
LINCOLNVL	0169 VERIZON NORTH INC.-PA	UNION CITY	0169 VERIZON NORTH INC.-PA	MERCER	9208 VERIZON PENNSYLVANIA, INC.
LINESVILLE	0176 WINDSTREAM PENNSYLVANIA, INC.	WATERFORD	0169 VERIZON NORTH INC.-PA	SANDY LAKE	0176 WINDSTREAM PENNSYLVANIA, INC.
MEADVILLE	0176 WINDSTREAM PENNSYLVANIA, INC.	WATTSBURG	0169 VERIZON NORTH INC.-PA	SHEAKLEYVL	0176 WINDSTREAM PENNSYLVANIA, INC.
SAEGERTOWN	0176 WINDSTREAM PENNSYLVANIA, INC.			WMIDDLESEX	9208 VERIZON PENNSYLVANIA, INC.
SPARTANSBG	0169 VERIZON NORTH INC.-PA				
TITUSVILLE	0169 VERIZON NORTH INC.-PA				
TOWNVILLE	0176 WINDSTREAM PENNSYLVANIA, INC.				
WESTFORD	0176 WINDSTREAM PENNSYLVANIA, INC.				

2. Are the local calling area exchanges different from the ILECs local calling areas for these exchanges? If so, how will customers know their local calling area?

Response:

Local Calling area exchanges are not different from the ILEC.

3. Which public utility is the incumbent local exchange carrier (ILEC) in the noted census blocks?

Response:

Please see table reference in question 1 response in section titled "GENERAL."

4. When did or will ATI contact municipalities in its the service areas to arrange for the provision of 911 emergency telecommunications service?

Response:

Armstrong began using Bandwidth, a third party, to manage 911 services approximately 2 years ago, and will use them for ATI.

5. Will ATI offer Lifeline to customers outside of Mercer, Crawford, and Erie Counties?

Response:

No, ATI will only be offering Lifeline to customer located in the CAF II awarded census blocks ATI is requesting ETC status for in Mercer, Crawford, and Erie Counties.

6. Is basic local service offered on a pre-paid or post-paid basis?

Response:

ATI's basic local service is offered on a post-paid basis, but all services are billed 1 month in advance.

7. Please provide a copy of ATI's price lists, terms and conditions, and consumer disclosures.

Response:

ATI's terms and conditions, and consumer disclosures can be found online at:  
<http://armstrongonewire.com/Support/Policies>  
ATI does not publish a price list.

8. The Commission's Bureau of Consumer Services handles consumer complaints and inquiries informally – primarily, but not limited to 52 Pa. Code Chapters 63 and 64. Please provide details

about ATI's procedure for managing billing disputes and service complaints, i.e. telephone number, intake practices, resolution, customer contact with the BCS.

Response:

Billing Disputes and service complaints are addressed by contacting Armstrong Customer Service at 1-877-486-4666 or Armstrong Customer Service, 437 North Main Street, Butler, Pennsylvania 16001.

Please refer to the Master Terms document

<http://armstrongonewire.com/content/documents/master-terms.pdf>

9. In the event BCS receives a consumer complaint from an ATI customer, please provide a resource email account that BCS is to use to work directly with ATI to resolve the complaint.

Response:

In the event BCS received a consumer complaint from an ATI customer, BCS should email [agencycomplaints@agoc.com](mailto:agencycomplaints@agoc.com) with complaint details.

10. As an Eligible Telecommunications Carrier, please confirm that ATI agrees to satisfy the standards outlined at 52 Pa. Code § 69.2501. *Standards applicable for designation and annual certification as an eligible telecommunications carrier, for purpose of obtaining Federal universal service support.* The section linked here - <https://www.pacode.com/secure/data/052/chapter69/s69.2501.html>.

Response:

ATI agrees to satisfy the standards outlined at 52 Pa. Code § 69.2501.

11. Annually, the Commission's Secretary provides docket numbers that ETCs are to use when filing relevant quarterly, annual, and other materials with the Commission. One docket number applies to low-income/Lifeline support. The second docket number applies to high-cost support. Both remain effective for a calendar year. Please confirm that ATI will satisfy all required filings.

Response:

ATI will satisfy all required quarterly, annual filings and will provide all required materials to the Commission.

From ATI's Application for Designation as an ETC:

**V. Please describe ATI's planned facilities.**

Response:

The planned FTTP network architecture allows for the delivery of voice and data services across the broadband access platform. Armstrong will utilize redundant Ethernet uplinks from the proposed FTTP electronics to its existing softswitch to facilitate voice services. While the existing softswitch contains existing connections to the public switched telephone network (PSTN) that will be required for this voice services implementation, Armstrong will establish any required interconnections and associated call translations to ensure proper availability of voice services in the assigned census blocks. The voice traffic is provisioned separately from the Internet traffic, which allows for the network operator to prioritize voice traffic over other types of traffic in order to maintain high-quality voice services.

Armstrong will also implement redundant Ethernet uplinks from the proposed FTTP electronics to its core data network. These redundant connections ensure highly reliable broadband data communication services. Armstrong will utilize its existing data network routers, Internet uplinks, and ISP services to support new customers from the assigned census block groups.

The FTTP technology utilized by Armstrong enables the service provider to provision peak data speeds to individual users up to 1 Gbps. Industry standard oversubscription rates will be utilized to be able to provide all customers within the assigned census block groups with a 1 Gbps service offering if requested.

**VI. That ATI certifies it will provide service on a timely basis to requesting customers within ATI's service area where ATI's network already passes the potential customer's premises, what is ATI's standard amount of time as a "timely basis" to begin service in this circumstance?**

Response:

ATI will provide service on a timely basis to requesting customers within ATI's service area where ATI's network already passes potential customer premises. ATI's standard amount of time to connect a new customer to ATI service is 2-4 business days.

That ATI will provide service within a reasonable period of time and within its CAF II build-out requirements, please provide ATI's build-out plan, including planned technologies.

Response:

ATI Build-out plan:



Year	Milestone Description	Last-Mile/ Middle-Mile	Locations Passed (Last Mile Only)	Cumulative Locations Passed	Required Interim Service Milestone
2019 (Year 1)	Preliminary Engineering Design	Both	0	1949	All awarded CAF locations passed by December 31, 2019
	Pole Fielding	Both	0		
	Pole Application Preparation and Submittal	Both	0		
	Determine BOM	Both	0		
	Order Materials for Initial Construction	Both	0		
	Complete Engineering Design	Both	0		
	Complete Final BOMs	Both	0		
	Order Materials for Initial Construction	Both	0		
	Install and Turn-up New Electronics Locations	Both	0		
	Establish new Interconnections for Voice Service	Middle	0		
	Construct Outside Plant	Both	1,949		
Install and Turn-up FTTP Electronics	Last-Mile	0			
Cutover Subscribers	Last-Mile	0			
2020 (Year 2)	Continue Providing Service to CAF Locations	Both	0	1949	
	Market the Service and Turn Up New Customers	Both	0		
2021 (Year 3)	Continue Providing Service to CAF Locations	Both	0	1949	
	Market the Service and Turn Up New Customers	Both	0		
2022 (Year 4)	Continue Providing Service to CAF Locations	Both	0	1949	
	Market the Service and Turn Up New Customers	Both	0		
2023 (Year 5)	Continue Providing Service to CAF Locations	Both	0	1949	
	Market the Service and Turn Up New Customers	Both	0		
2024 (Year 6)	Continue Providing Service to CAF Locations	Both	0	1949	
	Market the Service and Turn Up New Customers	Both	0		

ATI intends to build a Fiber to The Home (FTTH) architecture to serve the residential and business subscriber locations within the census blocks it was awarded. ATI plans to deploy gigabit passive optical network (GPON) to its customers. GPON is a FTTH technology that implements point-to-multipoint architecture to serve residential and business customers. This technology utilizes passive fiber optic splitters to enable 32 or more customer locations to be served by a single optical line terminal (OLT) port.

**XII.** That, as an ETC, ATI will offer Lifeline-eligible customers greater service choices, what services will be available to ATI Lifeline subscribers that are not available to Pennsylvania subscribers today?

Response:

ATI will be building a state of the art FTTP GPON network providing subscribers in these areas with broadband speed Internet that they do not currently have available today.

**XIV.** Please make the following correction in reference to 47 C.F.R. § 54.409(a)(2):

*"The consumer, **one or more of the consumer's dependents, or the consumer's household** must receive benefits from one of the following federal assistance programs . . . "*

Response:

ATI agrees with this clarification.



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[ArmstrongOneWire.com](http://ArmstrongOneWire.com)

\*Certain restrictions apply. Offer valid for existing Armstrong customers without Armstrong Telephone. Telephone service may not be available in all areas. \$9.95 offer available for customers with EasyPay and \$14.95 without EasyPay. Regular pricing applies after promotional period expires. Offer expires 10.31.18

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New Zoom customers only. Limited time offer and pricing. Offer may not be available in all areas. Promotional offer includes Zoom (up to 100 Mbps download) and Zoom Wi-Fi. Regular pricing for Zoom and Zoom Wi-Fi apply after 6 month promotional period expires. \$39.95 offer includes customers enrolled in EasyPay. Customers not enrolled in EasyPay will pay \$44.95 a month for 6 months. Offer ends 11/7/2018.



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## Self Help & Support

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# Armstrong (ATC) Offers Lifeline Service

## Lifeline 135

Armstrong offers a program to help our low-income residential customers keep their telephone service. This Federal program is called Lifeline 135 Service. If you are a low-income residential customer you may qualify.

**Lifeline 135** gives a monthly credit off your service. Customers have a choice on where to apply this credit.

Voice Only Service: This will require a customer to remain with the company providing your service for at least 60 days in order to keep the discount.

OR

Internet Service: A customer may choose to apply the credit on a qualifying internet service, which may be part of a bundle. This will require the customer to remain with the company providing your service for at least 12-months in order to keep the discount.

### Here's How to Qualify for Lifeline 135 Service:

You can get **Lifeline 135** if you are in one of these programs:

- Supplemental Security Income (SSI)
- Supplemental Nutrition Assistance Program (SNAP) – (f/k/a Food Stamps)
- Low Income Home Energy Assistance Program (LIHEAP) - New York Only
- Medicaid
- Federal Public Housing Assistance

OR

- Your yearly household income is at or below 135% of the Federal Poverty Guidelines.

To apply for Lifeline 135, contact Armstrong (/Contact/Index) during business hours to receive an application form. If you'd like more information on Lifeline 135, please visit the Universal Service Administrative Company (USAC) at [www.usac.org/li](http://www.usac.org/li) (<http://www.usac.org/li/>).

\*Not available in all areas. This service is only available in regulated areas served by Armstrong Telephone Company offices in Addison, NY; Clinton, PA; Duke Center, PA; Hamlin, WV; Harrisville, WV and Rising Sun, MD.

**Related Materials:**

[Understanding Your Statment \(UnderstandStatement\)](#) | [Payment Options \(PaymentOptions\)](#) | [Important Policies \(ImportantPolicies\)](#)

[support \(http://armstrongonewire.com/support/Index\)](http://armstrongonewire.com/support/Index) / [billing \(http://armstrongonewire.com/support/billing/Index\)](http://armstrongonewire.com/support/billing/Index) / [articles](#)



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[Screen Reader \(Talking Guide\)](#)  
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 (http://armstrongonewire.com/sites/fooll-smart-home-just-got-smarter-with-armstrong-exp-and-alexa)

[Armstrong App on EXP](#)  
 (/Support/EXP/Articles/ArmstrongOnEXP)

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
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**2x per year (Feb/July) Bill Message:**

**Armstrong Offers Lifeline Services**

Armstrong offers a Lifeline 135 Service to help low-income, residential customers get or keep their telephone service. If you are a low-income, residential customer you may qualify for these programs.

You qualify for Lifeline 135 if you are in one of these programs: Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP), Medicaid, Veteran or Survivor's Pension Benefit or Federal Public Housing Assistance OR your yearly income is at or below 135% of the Federal Poverty Guidelines.

For more information on Lifeline 135 Service, please contact our local business office.

**2x per year (Feb/July) Newspaper legal notice**

**Armstrong Offers Lifeline Services**

Armstrong offers a Lifeline 135 Service to help low-income, residential customers get or keep their telephone service. If you are a low-income, residential customer you may qualify for these programs.

You qualify for Lifeline 135 if you are in one of these programs: Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP), Medicaid, Veteran or



Exhibit A

Survivor's Pension Benefit or Federal Public Housing Assistance OR your yearly income is at or below 135% of the Federal Poverty Guidelines.

For more information on Lifeline 135 Service, please contact our local business office.

**On our website (see below):**

**Lifeline 135**

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**Lifeline 135** gives a monthly credit off your service. Customers have a choice on where to apply this credit.

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OR

Internet Service: A customer may choose to apply the credit on a qualifying internet service, which may be part of a bundle. This will require the customer to remain with the company providing your service for at least 12-months in order to keep the discount.

**Here's How to Qualify for Lifeline 135 Service:**

You can get **Lifeline 135** if you are in one of these programs:

- Supplemental Security Income (SSI)
- Supplemental Nutrition Assistance Program (SNAP) – (f/k/a Food Stamps)
- Medicaid
- Veteran's Pension or Survivor's Pension Benefit
- Federal Public Housing Assistance

OR

- Your yearly household income is at or below 135% of the Federal Poverty Guidelines.

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