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February 4, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**Re: Petition of Tri-Co Connections, LLC, for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania
Docket No. P-2018-3005127**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission (“Commission”) is Tri-Co Connections, LLC’s (“Tri-Co”) Petition to amend for designation as an eligible telecommunications carrier (“ETC”) in the Commonwealth of Pennsylvania. Because Tri-Co was awarded support for the additional Census Block Groups as part of the Federal Communications Commission’s (“FCC’s”) recent Rural Digital Opportunity Fund (“RDOF”) auction, Tri-Co requests Commission approval to amend its ETC designation to reflect those additional Census Block Groups. **Pursuant to the FCC’s RDOF Phase I auction rules and procedures, Tri-Co must obtain this updated ETC designation by June 7, 2021. Accordingly, Tri-Co requests expedited consideration of this Petition.**

As shown by the attached Certificate of Service and per the Commission’s March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. We are also filing these documents electronically. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

If you have any questions, please feel free to contact the undersigned. Thank you.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 
Kenneth R. Stark

Counsel to Tri-Co Connections, LLC

Enclosures

c: Certificate of Service
Ms. Erin Laudenslager, Bureau of Technical Utility Services (via Email)

www.McNeesLaw.com

HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • YORK, PA • COLUMBUS, OH • FREDERICK, MD • WASHINGTON, DC

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA FIRST-CLASS MAIL

Tanya McCloskey, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Frontier Communications of Canton, LLC
100 CTE Drive
Dallas, PA 18612

Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101

Frontier Communications of Oswayo River, LLC
100 CTE Drive
Dallas, PA 18612

Office of Attorney General
Office of Consumer Protection
Strawberry Square
Harrisburg, PA 17120

North Penn Telephone Company
4145 Route 549
Mansfield, PA 16933-9621

Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone Company
100 CTE Drive
Dallas, PA 18612

Windstream Pennsylvania, Inc.
4001 Rodney Parham Road
Little Rock, AR 72212

Verizon Pennsylvania, Inc.
417 Walnut Street, 1st Floor
Harrisburg, PA 17101

Verizon North, LLC
417 Walnut Street, 1st Floor
Harrisburg, PA 17101

VIA E-MAIL

Barrett C. Sheridan
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
BSheridan@paoca.org



Kenneth R. Stark

Counsel to Tri-Co Connections, LLC

Dated this 4th day of February, 2021, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF TRI-CO CONNECTIONS,
LLC, FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN
THE COMMONWEALTH OF
PENNSYLVANIA** :
: **DOCKET NO. P-2018-3005127**
:
:
:
:
:

**PETITION OF TRI-CO CONNECTIONS, LLC,
TO AMEND HIGH-COST ELIGIBLE TELECOMMUNICATIONS CARRIER
DESIGNATION IN THE COMMONWEALTH OF PENNSYLVANIA
TO ADD ADDITIONAL CENSUS BLOCK GROUPS**

**EXPEDITED TREATMENT REQUESTED
DECISION REQUESTED BEFORE JUNE 7, 2021**

Tri-Co Connections, LLC (“Tri-Co”), pursuant to Section 214(e)(2)¹ of the Communications Act of 1934, as amended (the “Act”), Section 54.101 of the rules and regulations of the Federal Communications Commission (“FCC”),² Section 54.201 *et seq*³ of the rules and regulations of the FCC, Section 3019(f) of the Pennsylvania Public Utility Code,⁴ and Sections 5.41 and 69.2501 of the Rules of the Pennsylvania Public Utility Commission (“PUC” or “Commission”),⁵ hereby submits this Petition to Amend its Designation as an Eligible Telecommunications Carrier (“Petition”). Tri-Co seeks to add additional Census Block Groups

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. § 54.101.

³ *Id.* at § 54.201, *et seq.*

⁴ 66 Pa. C.S. § 3019(f).

⁵ 52 Pa. Code §§ 5.41 69.2501.

(“CBGs”) to the list of CBGs that the Commission approved for Tri-Co’s high-cost Eligible Telecommunications Carrier (“ETC”) designation in the Order issued on April 11, 2019 at Docket No. P-2018-3005127.⁶ As explained below, Tri-Co was awarded support for the additional CBGs as part of the Federal Communications Commission’s (“FCC”) recent Rural Digital Opportunity Fund (“RDOF”) auction. The additional CBGs are part of Tri-Co’s existing service area. Adding the CBGs to Tri-Co’s existing high cost ETC designation will facilitate access to funds from the federal RDOF auction for the purpose of providing service to high-cost areas. **Tri-Co requests expedited treatment for this Petition to ensure that the designation is issued no later than June 7, 2021; however, earlier approval of this Petition will enable Tri-Co to confirm its access to the RDOF funding and incorporate the additional network construction requirements into its existing network buildout plan.**

In support hereof, Tri-Co states as follows:

I. INTRODUCTION

1. Tri-Co⁷ is a PUC-licensed Competitive Local Exchange Carrier approved to provide service in the territories of Verizon Pennsylvania LLC; Verizon North LLC; Commonwealth Telephone Company d/b/a Frontier Communications Commonwealth Telephone

⁶ *Petition of Tri-Co Connections, LLC for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania*, Docket No. P-2018-3005127 (April 11, 2019) (“ETC Order”).

⁷ Tri-Co is a wholly-owned subsidiary of Tri-County Rural Electric Company, Inc. (“TCREC”). TCREC is an 82-year-old, member-owned, non-profit electric cooperative in north-central Pennsylvania. Today, TCREC serves over 18,000 customers with electric service across a more than 3,300-mile distribution system. TCREC’s service territory encompasses a seven-county region, providing electricity to customers in Pennsylvania’s Bradford, Cameron, Clinton, Lycoming, McKean, Potter and Tioga counties. Approximately 95% of TCREC’s accounts are either residential or seasonal. The remaining 5% are either public authority, commercial or industrial accounts.

Company; Frontier Communications of Canton, LLC; Frontier Communications of Oswayo River, LLC; North Penn Telephone Company; and Windstream Pennsylvania, LLC.⁸

2. On April 19, 2019, the PUC issued an Order approving Tri-Co's Petition to be designated as a federal high cost ETC in discrete census blocks within Tri-Co's service area, and as a Lifeline-only ETC in all other census blocks in Tri-Co's service area where Tri-Co was not receiving high-cost support.

3. The April 19, 2019, Order found that "Tri-Co satisfies all federal and Pennsylvania-specific requirements for ETC designation."⁹

4. The April 19, 2019, Order further found that "it is in the public interest that Tri-Co be designated an ETC for purposes of deploying and maintaining voice and broadband service in the rural high-cost eligible census blocks where it will receive Auction 903 funding support."¹⁰

5. On January 30, 2020, the FCC established the RDOF to distribute additional funding for the deployment of high-speed broadband networks in rural portions of the United States. The FCC's focus remains on driving economic growth in rural America by expanding broadband and voice connectivity to consumers, thus expanding the online marketplace and creating jobs and business opportunities across the country. In July 2020, the FCC began an auction ("Auction 904") to allocate RDOF support to certain eligible areas across the United States.

⁸ *Application of Tri-Co Connections, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public in the Commonwealth of Pennsylvania as a Competitive Local Exchange Carrier in the Service Territories of: Verizon Pennsylvania, LLC; Verizon North LLC; Commonwealth Telephone Company d/b/a/ Frontier Communications Commonwealth Telephone Company; Frontier Communications of Canton, LLC; Frontier Communications of Oswayo River, LLC; North Penn Telephone Company; and Windstream Pennsylvania, LLC*, Docket No. A-2018-3005309 & *Application of Tri-Co Connections, LLC for Approval to Offer, Render, Furnish or Supply Telecommunications Services to the Public in the Commonwealth of Pennsylvania as a Detariffed Facilities-based Interexchange Carrier*, Docket No. A-2018-3005312, (December 6, 2018). On July 17, 2020, Tri-Co submitted an Amendment to its Application that modified the Interexchange Carrier designation from "facilities-based" to "reseller."

⁹ *ETC Order*, p. 50.

¹⁰ *Id.* at 2.

6. Tri-Co participated in Auction 904 as part of a bidding group known as the Co-op Connections Consortium, which collectively was awarded \$42.6 million for locations in Pennsylvania. Tri-Co was awarded \$10,988,229 in RDOF funding for 23 CBGs in Bradford, Lycoming, Potter and Tioga Counties. The specific CBGs are set forth in **Exhibit 1**.

7. On January 29, 2021, Tri-Co submitted its long-form application for the RDOF award (**Exhibit 2**). January 29, 2021, also marked the end of the non-collusion “quiet period” under the rules for Auction 904, which prohibited Tri-Co from publicly discussing the status of its bid in the auction.¹¹

7. One of the requirements to obtain the RDOF funding is demonstrating that the carrier has been designated as a high-cost ETC in the awarded CBGs.¹² The carrier must submit confirmation of this designation by June 7, 2021.¹³

8. Tri-Co respectfully requests to amend its existing high-cost ETC designation to add the CBGs that it was awarded in Auction 904. The additional CBGs are already in the service area for which Tri-Co previously had been approved as a CLEC and designated as a Lifeline-only ETC.

9. To the extent necessary, Tri-Co hereby incorporates into this submission all information and pleadings previously submitted in support of its existing ETC designations at Docket No. P-2018-3005127.

¹¹*Notice and Filing Requirements and other Procedures for Auction 904*, AU Docket No. 20-34, WC Docket No. 19-126, WC Docket No. 10-90, FCC 20-77, ¶ 146 (June 11, 2020); *see generally id.*, ¶ 146-176. Based on Tri-Co’s understanding of the non-disclosure rules, it was not able to submit this public regulatory filing during the quiet period.

¹² Public Notice, *RURAL DIGITAL OPPORTUNITY FUND PHASE I AUCTION (AUCTION 904) CLOSES, WINNING BIDDERS ANNOUNCED*, AU Docket No. 20-34 and WC Docket Nos. 19-126 and 10-90, at p. 13-14 (Dec. 7, 2020) (“RDOF I Public Notice”) The RDOF I Public Notice is available here: [DA-20-1422A1.pdf \(fcc.gov\)](#).

¹³ *Id.* at p. 7, 13-14.

WHEREFORE, for the forgoing reasons, Tri-Co Connections, LLC, respectfully requests that the Commission expeditiously designate it as a high-cost ETC in the Commonwealth of Pennsylvania for the additional Census Block Groups awarded in the Rural Digital Opportunity Fund auction.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By  _____

Kenneth Stark (PA ID No. 312945)
Jo-Anne Thompson (PA ID No. 325956)
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P.O. Box 129
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ppolacek@ctenterprises.org

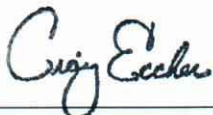
Counsel to Tri-Co Connections, LLC

Dated: February 4, 2021

Verification

I, Craig Eccher, hereby state that the facts set forth in the foregoing Petition are true and correct (or are true and correct to the best of my knowledge, information and belief), and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

2-1-2021
Date



Signature

Craig Eccher, President of Tri-Co Connections LLC

Printed name

EXHIBIT 1

CENSUS BLOCK GROUPS AWARDED TO TRI-CO IN RDOF AUCTION

EXHIBIT 1

CENSUS BLOCK GROUPS AWARDED TO TRI-CO IN RDOF AUCTION

Census Block Group	State	County	Eligible Locations
420159505005	PA	Bradford	8
420159505006	PA	Bradford	22
420159507001	PA	Bradford	64
420159507002	PA	Bradford	192
420159508002	PA	Bradford	14
420159508004	PA	Bradford	204
			504
420810101001	PA	Lycoming	849
420810102001	PA	Lycoming	167
			1016
421059501001	PA	Potter	139
421059501002	PA	Potter	155
421059501003	PA	Potter	184
421059501004	PA	Potter	188
421059502001	PA	Potter	224
421059502003	PA	Potter	55
421059504003	PA	Potter	415
421059505003	PA	Potter	309
421059503001	PA	Potter	63
421059504001	PA	Potter	68
			1800
421179509002	PA	Tioga	208
421179509003	PA	Tioga	90
421179510003	PA	Tioga	186
421179502001	PA	Tioga	10
421179510002	PA	Tioga	130
			624
TOTAL			3944

EXHIBIT 2

TRI-CO CONNECTIONS, LLC'S LONG-FORM SUBMISSION

(JANUARY 25, 2021)



(Print Copy For Reference Only)
Auctions: Form 683

Status: **Submitted**
Date Received: 1/25/21
File Number: 0009384343

Applicant Information

Legal Classification

Limited Liability Company

Applicant Name

Entity Name	Address	Jurisdiction of Formation
Tri-Co Connections, LLC	22 N. Main Street Mansfield, PA 16933 United States	Pennsylvania

Responsible Party: Limited Liability Company

Name	Phone	Email	Address
Rachel Hauser <i>CECD Director of Regulatory</i>	(570) 662-8020	rachelh@ctenterprises.org	22 N. Main Street Mansfield, PA 16933 United States

Contact Information

Name	Phone	Fax	Email	Address
Crystal Hanus	(830) 895-7249	(830) 896-5202	crystal.hanus@vantagepnt.com	1836 Junction Hwy Kerrville, TX 78028 United States

Winning Bids ETC Designation

Package/Item Name	ETC	State
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Financial Statements

Question	Response
Did the applicant submit audited financial statements with its short-form application?	Yes

Winning Bids

Winning Bids Attachments

File Name	Type	Description	State	Date Uploaded	Upload Status
Tri-Co Connections - Attachment A - Initial Project Overview.pdf	Initial Project Overview	Attachment A - Initial Project Overview	PA	01/25/2021 12:59:57 PM ET	Converted Successfully
Tri-Co Connections - Attachment C - Project Funding Description.pdf	Project Funding Description	Attachment C - Project Funding Description	PA	01/25/2021 01:00:21 PM ET	Converted Successfully

Winning Bids Summary

^X indicates a package (followed by the number of items within the package)

Show Bid Details

Winning Bid	State	Items	ETC	Status of Support
PA-015-9505005	PA	1	No	-
PA-015-9505006	PA	1	No	-
PA-015-9507001	PA	1	No	-
PA-015-9507002	PA	1	No	-
PA-015-9508002	PA	1	No	-
PA-015-9508004	PA	1	No	-
PA-081-0101001	PA	1	No	-
PA-081-0102001	PA	1	No	-
PA-105-9501001	PA	1	No	-
PA-105-9501002	PA	1	No	-
PA-105-9501003	PA	1	No	-
PA-105-9501004	PA	1	No	-
PA-105-9502001	PA	1	No	-
PA-105-9502003	PA	1	No	-
PA-105-9503001	PA	1	No	-
PA-105-9504001	PA	1	No	-
PA-105-9504003	PA	1	No	-
PA-105-9505003	PA	1	No	-
PA-117-9502001	PA	1	No	-
PA-117-9509002	PA	1	No	-
PA-117-9509003	PA	1	No	-
PA-117-9510002	PA	1	No	-
PA-117-9510003	PA	1	No	-

Agreements

Agreements with Other Parties

- Yes, the applicant *has* entered into partnerships, joint ventures, consortia, or other agreements, arrangements, or understandings of any kind relating to the potentially eligible areas being auctioned, including any agreements that address or communicate directly or indirectly bids (including specific prices), bidding strategies (including the specific potentially eligible areas on which to bid or not to bid), or the post-auction market structure, to which the applicant, or any party that controls or is controlled by the applicant, is a party.

Agreements

Agreement ID	Agreement Type	Name	Type	FRN
Co-op Connections Consortium	Consortium	BARConnects, LLC	Entity	0027842772
		Claverack Rural Electric Cooperative, Inc.	Entity	0026709063
		Gibson Connect, LLC	Entity	0027354836
		Illinois Electric Cooperative	Entity	0004821989
		Jo-Carroll Energy, Inc. (NFP)	Entity	0002860468
		Lake Region Technology & Communications, LLC	Entity	0023985237

Agreement ID	Agreement Type	Name	Type	FRN
		Marshall County Fiber, LLC	Entity	0027242494
		Northcentral Electric Cooperative	Entity	0001743400
		Northwestern Rural Electric Cooperative Assoc, Inc	Entity	0028501799
		Roanoke Connect Holdings, LLC	Entity	0030279178
		Somerset Rural Electric Cooperative, Inc.	Entity	0029757226
		Tipmont Rural Electric Membership Corporation	Entity	0028774750
		Tri-County Rural Electric Cooperative, Inc.	Entity	0029743770

Ownership

Disclosable Interest Holders of this Applicant

Alfred Calkins

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Director ■ Other : Director of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Director of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

James Davis

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Director ■ Other : Director of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Director of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder
You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Craig Eccher

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Key Management Personnel ■ Other : President & CEO of Tri-County 	<ul style="list-style-type: none"> ■ Other : President & CEO of Tri-County 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder
You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Lowell Geiser

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Director ■ Other : Director of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Director of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder
You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Rachel Hauser

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Key Management Personnel ■ Other : Director of Regulatory & Economic Development of Tri-County 	<ul style="list-style-type: none"> ■ Other : Director of Regulatory & Economic Development of Tri-County 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Gerald Kriner

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Officer ■ Director ■ Other : Vice Chairman of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Vice Chairman of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Nicholas Reitter III

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Officer ■ Director ■ Other : Vice Secretary/Treasurer of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Vice Secretary/Treasurer of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Valery Robbins

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Officer ■ Director ■ Other : Secretary/Treasurer of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Secretary/Treasurer of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Jerome Sasala

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Director ■ Other : Director of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Director of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Alston Teeter

Disclosable Interest Holder Information

Type	FRN	Address
Individual		22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Director ■ Other : Director of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Director of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

Tri County Rural Electric Cooperative, Inc.

Disclosable Interest Holder Information

Type	Entity Type	FRN	Address
Entity	Other : Cooperative	0029743770	22 N. Main Street Mansfield, PA 16933

Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Jurisdiction of Formation
<ul style="list-style-type: none"> ■ Direct Ownership Interest in Applicant ■ Other : Parent Company of Tri-Co Connections, LLC 	<ul style="list-style-type: none"> ■ Other : Parent Company of Tri-Co Connections, LLC 	100.00%	Pennsylvania

FCC Regulated Business held by this Disclosable Interest Holder

FRB (FCC Regulated Businesses) Name	Principal Business	FRN	Percent of Interest Held by DIH
Tri-Co Connections, LLC	Telecommunications	0027832633	100.00%

Matthew Whiting

Disclosable Interest Holder Information

Type	FRN	Address
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Type	FRN	Address	
Individual		22 N. Main Street Mansfield, PA 16933	
Type of Interest in Applicant	Type of Ownership Interest in Applicant	Disclosable Interest Held in Applicant	Country of Citizenship
<ul style="list-style-type: none"> ■ Indirect Ownership Interest in Applicant ■ Officer ■ Director ■ Other : Chairman of Tri-County Board 	<ul style="list-style-type: none"> ■ Other : Chairman of Tri-County Board 	0.00%	United States

FCC Regulated Business held by this Disclosable Interest Holder

You have not specified any FCC Regulated Businesses held by this Disclosable Interest Holder

FCC Regulated Businesses of this Applicant

You have not specified any FCC Regulated Businesses.

Certify and Submit

Certify Auction Application

I certify the following:

1. that the applicant is in compliance with all statutory and regulatory requirements.
2. that the applicant is financially and technically qualified to meet the public interest obligations of section 54.309 of Title 47 of the Code of Federal Regulations for each relevant performance tier and latency combination and in each area for which it seeks support.
3. that the applicant will have available funds for all project costs that exceed the amount of support to be received from the Phase II auction for the first two years of its support term and will comply with all program requirements, including service milestones.
4. that the applicant will meet the public interest obligations for each relevant tier, including the requirement that it will offer service at rates that are equal to or lower than the Commission's reasonable comparability benchmarks for fixed services offered in urban areas.
5. that the applicant acknowledges that it must be designated as an Eligible Telecommunications Carrier pursuant to section 214(e) of Title 47 of the United States Code (47 U.S.C. § 214(e)) in the area(s) in which it will receive support prior to being authorized to receive such support. If the applicant has already been designated as an Eligible Telecommunications Carrier in any area(s) in which it will receive support, the applicant has provided a certification of its status in each such area and relevant documentation supporting that certification in this application. If the applicant has not yet been designated as an Eligible Telecommunications Carrier in an area in which it will receive support, the applicant will submit a certification of its status as an Eligible Telecommunications Carrier in each such area and relevant documentation supporting that certification no later than 180 days after the public notice identifying the winning bidders and prior to being authorized to receive such support.
6. that the description of spectrum access in areas for which the applicant will seek support provided in this application to participate in competitive bidding is correct and the applicant will retain such access for at least ten (10) years after the date on which it is authorized to receive support.
7. that the applicant and any party to this application are not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.
8. that the applicant is aware that if this application is shown to be defective, the application may be dismissed without further consideration and penalties may apply.

I declare, under penalties of perjury, that I am an authorized representative of the above named applicant, that I have read the instructions and the foregoing certifications, and that all matters and things stated in this application, its schedules, and attachments, including exhibits, are true and correct.

Signature

Rachel Hauser

Director of Regulatory Affairs