

WEIKLE & Co.

June 4, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

RE: Armstrong Telecommunications, Inc. – P-2018-3005035, Application for Amended Designation as an Eligible Telecommunications Carrier (ETC)

Dear Secretary Chiavetta:

On behalf of Armstrong Telecommunications, Inc. (ATI), enclosed are Responses to the Second Data Request question and reminders from the Bureau of Consumer Services.

If there are any questions, I can be reached at 704.699.9451.

Sincerely,

/s/ Jerry Weikle

Jerry Weikle
Consultant to Armstrong Telecommunications, Inc.

cc: Shawn Beqaj

Attachments

Armstrong Telecommunications, Inc. – P-2018-3005035
Application for Amended Designation as an Eligible Telecommunications Carrier (ETC)
Second Data Request Responses

1. To retain a record, how does ATI obtain affirmative acknowledgement prior to initiation of service that each subscriber understands the circumstances in which access to 911/ E911 emergency service may be limited or unavailable? 47 CFR §9.11(b)(5)(ii) and (iii). 47 CFR § 9.20.

RESPONSE: Armstrong Telecommunications, Inc. (ATI) discloses the limits of the service in the event of a power outage during order entry (whether online or over the phone). The customer is emailed an Adobe/EchoSign form where they acknowledge possible service limitations in the event of commercial power outage by initialing three sections and signing. It is mailed when electronic collection is not available. If the document was not previously signed and returned by the time the installer arrives on the day of install, the work order requires the customer to initial and sign via the technician's mobility app. A set of stickers is offered to customers to place on phones should they want the reminder. The signed document is kept on file.

As a residential local exchange carrier (LEC), ATI is to submit §64.201 Annual LEC data separate from the Armstrong ILEC using the [PA PUC Local Exchange Carrier Reporting Portal](#). The § 64.201 Annual LEC data is due annually on or before January 30. If ATI provided residential voice service during 2020, please submit corrected data.

RESPONSE: ATI was not previously aware of this requirement for non ILEC entities. ATI is working to rectify this.

Reminder: As an competitive eligible telecommunications carrier (CETC), ATI is required to report Lifeline enrollment and disconnections data separate from the Armstrong ILECs using the [PA PUC Local Exchange Carrier Reporting Portal](#). The Lifeline Tracking Report is due annually on or before June 30.

RESPONSE: ATI does not have any Lifeline customers in its existing ETC footprint where it is receiving federal CAF II funding. Facilities are still being constructed in the CAF II ETC footprint in compliance to program buildout requirements.

Carriers are to inform BCS when the company begins to provide service, and to establish access to the online reporting portal by sending an email to BCS staff at RA-PCTELCO-PA@pa.gov.

RESPONSE: Since ATI has been in operation for some time, it was not aware that this requirement applied to non-ILEC entities. ATI is working to rectify this.