

**Before the
Pennsylvania Public Utility Commission**

In the Matter of)
)
Youngsville Television Corporation) Docket No. _____
)
Petition for Designation as an)
Eligible Telecommunications Carrier)
Pursuant to Section 214(e)(2) of the Act)

**PETITION FOR ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION**

Pursuant to section 214(e)(2) of the Communications Act of 1934 (“Act”) and the rules of the Federal Communications Commission (“FCC”), and the requirements of the Pennsylvania Public Utility Commission, (“Commission” or “PUC”) as set forth in 52 Pa. Code § 69.2501,¹ Youngsville Television Corporation, dba Blue Fiber Corp (“YTV” or “Company”) respectfully requests designation as a high-cost eligible telecommunications carrier (“ETC”) in the State of Pennsylvania for a service area comprised of the 386 funded census blocks in its winning bids in the recent FCC Rural Digital Opportunity Fund (“RDOF”) Phase I auction, as more fully described below.

On December 7, 2020, the FCC announced the winning bidders for the RDOF Phase I auction.² As receipt of \$5,031,287.70 in funding over a ten-year period (\$503,128.77 annually) is contingent upon the Company’s designation as an ETC for the supported areas, YTV respectfully requests that the PUC expeditiously review and approve this Application in order to accelerate the deployment of critical broadband and voice services in these rural areas. YTV is obligated to submit to the FCC documentation

¹ See *Final Policy Statement on Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an Eligible Telecommunications Carrier (ETC) for Purposes of Federal Universal Service Support*, Docket No. M-2010-2164741 (Order entered August 2, 2010) (*ETC Guidelines Order*); see also *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371 (2005) (*2005 ETC Designation Order*).

² *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced*, Public Notice, DA No. 20-1422 (OEA/WCB rel. Dec. 7, 2020) (*RDOF Auction Closing Public Notice*).

of its ETC designation within 180 days of the *RDOF Auction Closing Public Notice* in order to be authorized to receive RDOF support,³ and it therefore requests action on this Petition before June 7, 2021, in order to meet this FCC deadline.

I. BACKGROUND

A. The Company

YTV is a Pennsylvania 501(c)(12) not for profit corporation. The corporation was formed in 1952 and formally began operations in 1954. It was formed by local residents to provide television signal services over cable to the residents of Youngsville, Pennsylvania. It operates like a cooperative corporation. Clients pay a onetime membership fee to receive the services offered. Membership includes a discounted service rate and the privilege to be nominated for and vote in the annual election for board members. YTV is governed by a board of directors, elected from within its good standing members at the annual public meeting

In 2002, YTV incorporated two other small cable systems to cover the communities of Irvine and Pittsfield in Pennsylvania, forming what is now the current service area. YTV currently has a 27-mile hybrid fiber-coax (“HFC”) system in operation, with 675 active video subscribers.

In 2019, YTV made the business decision to transition from being a cable television provider to a voice, video, and internet provider.⁴ YTV realized it needed to replace its aging HFC plant with fiber and began pursuing federal grants to achieve that objective. It has been awarded a grant from the Appalachian Regional Commission to extend fiber into five unserved communities in Pennsylvania (Garland, Wrightsville, Chandlers Valley, Spring Creek, and Spartansburg), a Community Connect grant from the U.S. Department of Agriculture’s (“USDA”) Rural Utility Service to extend fiber into the community of

³ See 47 CFR § 54.315(b)(5).

⁴ For a number of years, a third-party service provider, Eaglezip, based in Jamestown, New York, has provided internet and voice services over the YTV HFC system. Eaglezip pays YTV a per client access fee to be the provider of services on the network.

Cherry Grove, Pennsylvania, and a 100% loan from USDA's Re-Connect program for its project to extend fiber into the community of Spartansburg, Pennsylvania.

Upon completion of the FCC's application process and authorization of funding, YTV will receive \$5,031,287.70 in funding over a ten-year period in exchange for deploying a network that will offer voice and gigabit broadband services to 4,398 homes and small businesses in Crawford and Warren counties in Pennsylvania. Exhibit A is a list of the census blocks in Pennsylvania for which YTV seeks high-cost ETC designation from the Commission in order to receive RDOF support.⁵

YTV plans to deploy a Gigabit Passive Optical Network ("GPON") in order to offer gigabit service to homes and businesses in the areas where authorized to receive RDOF funding. YTV plans to offer several tiers of Internet service, including service that meets the RDOF requirement of providing at least 1 Gigabit downstream/500 Mbps upstream, and will provide its customers with voice grade access to the Public Switched Telephone Network ("PSTN") through its interconnected Voice over Internet Protocol ("VoIP") service.

B. The Rural Digital Opportunity Fund

The FCC established the RDOF as a continuation of its efforts over nearly a decade to accelerate the deployment of high-speed fixed broadband service to all Americans. The program is being implemented in two phases, with the recently completed Phase I auction focused on areas that are wholly unserved under the FCC's current 25/3 Mbps standard for fixed broadband. The FCC will authorize RDOF support to companies that commit to deploy and maintain voice and broadband service meeting the FCC's requirements to a specified number of locations (homes and small businesses) in the identified high-cost areas.

In order to participate in RDOF, interested parties must complete a two-step application process, with competitive bidding to determine who will receive funding and the amount of funding to be provided

⁵ See Exhibit A (List of Census Blocks in which Youngsville Television Corporation Seeks Eligible Telecommunications Carrier Designation).

for a particular geographic area. The FCC determined which applicants were qualified to bid in the auction by evaluating information submitted in the so-called “short-form” application. The RDOF Phase I auction began on October 29, 2020 and concluded on November 25, 2020. As noted above, on December 7, 2020, the FCC issued a Public Notice, officially announcing the results of the competitive bidding process. In order to receive funding, winning bidders must complete a “long-form” application review process to demonstrate their financial and technical qualifications to deliver the intended service and meet other requirements.

As discussed in more detail below, the Commission has the authority to grant YTV’s petition for ETC designation pursuant to section 214(e)(2) of the Act, and YTV meets all of the statutory and regulatory requirements for ETC designation, both federal and state.

II. THE COMMISSION HAS AUTHORITY TO GRANT THE REQUESTED ETC DESIGNATION

Pursuant to section 214(e)(2) of the Act, a “State commission shall on its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission.”⁶ Section 214(e)(1), in turn, states:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

⁶ 47 U.S.C. § 214(e)(2).

III. YTV MEETS THE STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS AN ETC

As demonstrated herein, YTV satisfies each of the statutory and regulatory requirements set forth in the Act, the FCC's rules, and Pennsylvania-specific requirements.

A. YTV Will Provide Service as a Common Carrier

Pursuant to section 153(10) of the Act, "common carrier" is defined as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio[.]" 47 U.S.C. § 153(10). A carrier is eligible under section 54.201 of the FCC's rules so long as it offers the services set forth in section 54.101, either through its own facilities or a combination of its own facilities and the resale of another carrier's services and advertises the availability of such supported services using media of general distribution. Common carriers that provide services consistent with the requirements of section 214(e) may be designated ETCs.

As set forth herein, YTV will be providing the supported service over its own network infrastructure. For purposes of obtaining ETC designation, YTV certifies that it will offer the supported service in its requested service area as a common carrier under sections 214(e)(1) and 214(e)(2) of the Act.⁷

B. YTV Will Offer the Services Supported by the Federal Universal Service Support Mechanisms Throughout the Service Area for Which ETC Designation is Granted

For RDOF Phase I support recipients, the FCC defines the supported service as qualifying voice service and conditions grant of funding on the offering of qualifying broadband service.⁸ In the 2011

⁷ See Exhibit B (Affidavit of David Krack, President, Board of Directors, Youngsville Television Corporation ("Krack Affidavit")).

⁸ 47 CFR § 54.101 (including both eligible voice telephony and eligible broadband internet access as services "supported by federal universal service support mechanisms," and characterizing the provision of eligible broadband service as a high-cost public interest obligation); see also *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-94, 17695, paras. 77-83, 86 (2011) (*USF/ICC Transformation Order*), *aff'd sub nom. In re: FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014) (defining "voice telephony service" as the supported service and requiring high-cost support recipients to offer broadband as a condition of receiving support).

USF/ICC Transformation Order, the FCC modified the definition of a supported service to reflect a technologically neutral approach, enabling companies to provision voice service over any platform, including both the PSTN and Internet Protocol-based networks.⁹ Section 54.101 of the FCC’s rules was amended to specify that the functionalities of eligible voice telephony services include voice grade access to the PSTN *or its functional equivalent*.¹⁰

As described below, YTV certifies that it will provide the following services that are supported by the federal universal service support mechanisms.¹¹

1. Voice Telephony – YTV will offer interconnected VoIP service on a stand-alone basis using a third-party provider, Zito Media.¹² YTV will be legally responsible for dealing with customer problems and for providing service consistent with the FCC’s universal service requirements.

This service will include minutes of use for local service provided at no charge to end users (specifically, YTV’s service plans will offer unlimited usage within the United States) and access to emergency services via 911 or E-911. YTV will not distinguish between the pricing of toll and non-toll calls in the pricing of its voice service, and accordingly it is not obligated to provide toll limitation services to qualifying low-income consumers.¹³

2. Broadband Internet Access Services – YTV’s broadband Internet offering will provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service.

YTV will offer service at rates that are reasonably comparable to rates in urban areas. To meet its RDOF public interest obligations, YTV plans to offer 1 Gbps/500 Mbps broadband service for \$130 per month. YTV will offer standalone voice telephony for \$25 per month. It also expects to offer the following additional service tiers:

- Tier 1 – 25 Mbps down / 25 Mbps upload data rate \$25.00 / month

⁹ See *id.* at para. 78.

¹⁰ 47 CFR § 54.101(a) (emphasis added).

¹¹ See Exhibit B (Krack Affidavit).

¹² See *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197 and 10-90, Public Notice, 33 FCC Rcd 6696, 6698-6699 (WCB 2019) (*ETC Process Public Notice*) (“a broadband provider may satisfy its voice obligation by offering voice through an affiliate or by offering a managed voice solution (including VoIP) through a third-party vendor”).

¹³ 47 CFR § 54.401(a)(2).

- Tier 2 – 100 Mbps down / 100 Mbps upload data rate \$50.00 / month
- Tier 3 – 250 Mbps down / 250 Mbps upload data rates \$100.00 / month

All service offerings will have unlimited usage.

YTV commits to provide service consistent with the FCC’s high-cost universal service support rules applicable to it.¹⁴ In addition, YTV will offer Lifeline discounts to qualifying low-income consumers consistent with the FCC’s Lifeline rules in the RDOF-funded census blocks.¹⁵ YTV will advertise the availability of its Lifeline service offerings in the RDOF-funded census using media reasonably designed to reach those likely to qualify for that service. YTV understands its obligations to meet Lifeline requirements, such as participation in the National Lifeline Accountability Database and the Lifeline National Eligibility Verifier to qualify customers. YTV commits to complying with any additional state-specific applicable requirements regarding participation in the FCC’s Lifeline program.¹⁶

C. YTV Will Provide Service Using Its Own Facilities

All ETCs must offer qualifying voice service using their own facilities, at least in part.¹⁷ The FCC has interpreted the term “facilities,” for purposes of section 214(e) of the Act, to mean “any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support under section 254(c)(1).”¹⁸ As explained by the FCC, “a carrier need not offer universal service wholly over its own facilities in order to be designated an eligible carrier because the statute allows an eligible carrier to offer the supported services through a combination of its own facilities and resale.”¹⁹ Facilities are the ETC’s “own” if the ETC has exclusive right to use the facilities to provide the supported services.²⁰

¹⁴ See 47 CFR §§ 54.101(c), 54.805-54.806.

¹⁵ See *id.* § 54.101(d); *Lifeline Reform Order*, 31 FCC Rcd at 3974, 4074-75, paras. 35, 311-12 (requiring all high-cost recipients to meet Lifeline obligations in all areas where they deploy a network pursuant to a broadband service obligation and are commercially offering qualifying service).

¹⁶ See, e.g., 66 Pa. Code § 69.3101(f).

¹⁷ 47 U.S.C. § 214(e)(1); 47 CFR § 54.101.

¹⁸ *Federal-State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8847, para. 128 (1997).

¹⁹ *Id.* at 8870, para. 169.

²⁰ *Id.* at 8866, para. 160.

YTV will be a facilities-based broadband Internet access and VoIP service provider. As noted above, it plans to build and operate a fiber to the premise (“FTTP”) GPON network that will be used to deliver voice and broadband service in the RDOF-funded areas.

D. YTV Will Provide Supported Service Throughout Its Designated Service Area

YTV commits to providing the supported services throughout its ETC designated service area, consistent with all applicable requirements. YTV’s requested ETC designated service area for high-cost support – specifically, the Rural Digital Opportunity Fund – is limited to the census blocks identified in Exhibit A.

E. YTV Will Advertise the Availability of Its Services and Charges Using Media of General Distribution

YTV will advertise the availability of, and charges for, its supported service offerings using media of general distribution in a manner that is designed to reach those likely to qualify for such service and plans to undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements. YTV will advertise its supported services to all eligible customers using a mix of printed materials such as direct mail on a recurring basis and digital advertising,²¹ with a goal of ensuring every potential customer knows the service is available. YTV intends to use locally based community advertising, such as banners, lawn signs, and other community-oriented media, to inform prospective customers of its services. It plans to place door hangers on individual homes and businesses as the network is deployed to announce the availability of services in the area.

²¹ Communications channels have evolved considerably in recent years to include channels beyond traditional print and broadband media. The FCC has recognized this transition for advertising to Lifeline eligible customers as well. *See Lifeline Reform Order*, paras. 362-365; *Lifeline and Link-Up*, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 8302, para. 46 (2004) (including in its guidelines that carriers may post outreach material on the Internet).

F. YTV Will Comply with the FCC's Additional Requirements for Designation as an ETC

In 2005, the FCC adopted section 54.202(a)(1) of its FCC's rules, requiring an ETC applicant to submit a five-year plan for proposed improvements or upgrades to the applicant's network unless the applicant is seeking Lifeline support only. However, subsequently, the FCC eliminated the five-year improvement plan requirement for price cap carriers, rate-of-return carriers and winning bidders in the context of the Connect America Fund Phase II auction.²² YTV presumes, consistent with precedent, that the PUC will similarly not require submission of a five-year improvement plan for winning bidders in the RDOF Phase I auction.

Upon authorization to receive RDOF support, YTV will be subject to the FCC's interim and final deployment milestones, which require it to offer broadband service to at least 40% of the required number of locations by the end of the third year, 60% by the end of the fourth year, 80% by the end of the fifth year, and 100% by the end of the sixth year. Those deployment milestones represent YTV's plan for use of funding over the next five years.

YTV certifies that it possesses the financial and technical capabilities to complete construction of its planned broadband network and to meet its ETC obligations by offering voice and broadband services throughout the proposed service area. As part of the FCC's long-form application process, YTV will be providing an overview of how it will finance its planned network in the RDOF-funded areas and a certification from a professional engineer that the fiber optic network is capable of delivering voice and broadband service that meets the requisite RDOF performance requirements with sufficient capacity to meet customer demand at or above the prescribed levels during peak usage.

Section 54.202(a)(2) of the FCC's rules requires that a company seeking ETC designation to 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

²² See *Connect America Fund et al.*, Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Red 3087, 3166, 3168, paras. 216, 220 (2016) (eliminating five-year plan and related progress reports for federal rate-of-return and price cap carriers); see also *ETC Process Public Notice*, 33 FCC Rcd at 6699-6700.

reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. YTV certifies that its fiber optic network will have the ability to remain functional in emergency situations, will be able to reroute traffic around damaged facilities, and will be capable of managing traffic spikes resulting from emergency situations, and that it will provide 8 hours of battery back-up power to ensure functionality without an external power source. YTV's fiber optic network will support telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including 911 services.

YTV certifies that it will satisfy all consumer protection and service quality standards required by the FCC,²³ as well as all applicable state-specific consumer protection and service quality standards.

YTV submits that sections 54.202(a)(4)-(6) of the FCC's rules are inapplicable to it, as it is not seeking Lifeline-only designation anywhere in the Commonwealth. YTV understands, however, that an ETC has certain obligations to offer Lifeline service in its ETC designated service area, and it commits to meeting those requirements as described below.

Section 54.405(a) of the FCC's rules requires an ETC to make available Lifeline service, as defined in section 54.401 of the FCC's rules, to qualifying low-income customers. Further, section 54.408 of the FCC's rules requires YTV to conform to certain minimum service standards for Lifeline supported services. YTV certifies that its proposed fixed voice and broadband service offering will conform to the definition of Lifeline in the FCC's rules and to the minimum service standards set forth therein.

YTV plans to offer the same Lifeline service to all customers in the RDOF-funded areas. The Lifeline offering will enable low-income households to apply the FCC's Lifeline discount to all services that are generally available to all YTV customers, specifically:

²³ See 47 CFR. § 54.202(a)(3). For applicants seeking ETC designation for the purposes of becoming authorized to receive Connect America Fund Phase II auction support, the FCC waived the requirement to submit proof of compliance with consumer protection and service quality standards—finding that the need for such requirements is obviated by specific service quality standards applicable to the winning bid areas and specific reporting obligations relating to such standards. See *ETC Process Public Notice*, 33 FCC Rcd at 6699-6700.

- Standalone Voice \$25.00 / month
- Tier 1 – 25 Mbps down / 25 Mbps upload data rate \$25.00 / month
- Tier 2 – 100 Mbps down / 100 Mbps upload data rate \$50.00 / month
- Tier 3 – 250 Mbps down / 250 Mbps upload data rates \$100.00 / month
- Tier 4 – 1 Gigabit down / 500 Mbps upload data rates \$130.00 / month

As such, YTV’s Lifeline offerings will significantly exceed the FCC’s current 25/3 Mbps minimum service standards for fixed broadband Lifeline service. The Lifeline subsidy will be used to reduce the amount charged for each service offering.

Section 54.405(b) of the FCC’s rules requires an ETC to publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. In addition, sections 54.405(c) and (d) of the FCC’s rules require materials describing the Lifeline service (i.e., all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms) to contain certain disclosures and administrative information about the Lifeline service offering. Such provisions require, for example, that the materials: disclose the name of the ETC; use easily understood language to indicate that the service is a Lifeline service and that Lifeline is a government assistance program; and indicate that the service is non-transferrable, that only eligible consumers may enroll in the program, and that the program is limited to one discount per household. While YTV has not yet finalized its marketing materials for Lifeline service, YTV certifies that upon ETC designation, its marketing materials for Lifeline service will comply with these requirements.

YTV certifies that sections 54.202(c)-(e) of the FCC’s rules are inapplicable to this petition, as it does not seek ETC designation to serve a Tribal land, and it is seeking designation as a high-cost ETC, not as a Lifeline broadband provider.

IV. DESIGNATION OF YTV AS AN ETC WILL BE IN THE PUBLIC INTEREST

Section 214(e)(2) of the Act states that, “[u]pon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible

telecommunications carrier” for a designated service area, so long as the requesting carrier meets the requirements of Section 214(e)(1). Section 214(e)(2) further states: “[b]efore designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.”

In the context of the Connect America Fund Phase II auction, the FCC concluded that “carriers need not provide additional specific evidence of service to the public interest in their petitions for ETC designation.”²⁴ It reasoned that applicants were required to submit information demonstrating their ability to meet their public interest obligations in their short-form and long-form applications. Because the PUC’s policy statement at 52 Pa. Code § 69.2501 adopted the FCC’s standards for ETC designation set forth in 47 C.F.R. §54.202(b), YTV presumes that the PUC does not require additional evidence that grant of ETC status to YTV would serve the public interest. To the extent that the PUC requires an affirmative public interest showing, however, YTV submits that grant of its requested ETC designation would serve the public interest as described below.

Designation of YTV as an ETC in Pennsylvania will serve the public interest by facilitating the FCC’s goal of deploying voice and high-speed broadband networks in rural, high-cost areas lacking 25/3 Mbps broadband service. As a recipient of federal high-cost funding, the Company will deploy advanced communications to unserved and underserved areas in Pennsylvania, offering gigabit service and other service tiers through a FTTP network. Moreover, YTV will be the *only* provider in its proposed service area that is authorized to receive federal RDOF support for the development and deployment of this essential communications infrastructure. YTV will be obligated to deploy a network bringing new high-speed, scalable broadband service to 4,398 homes and small businesses in Pennsylvania. Consequently, designating the Company as an ETC will directly benefit more than 8,800 residents of the proposed service area in Pennsylvania by ensuring that they receive the benefits of this federal funding.

²⁴ See *ETC Process Public Notice*, 33 FCC Rcd at 6701.

Expedited designation of YTV, a locally-based service provider with deep roots in the community it serves, will serve the public interest by ensuring that the Company is eligible to receive federal high-cost USF support and able to deploy critical communications facilities as soon as possible. Events of the last year have made it clear, more than ever, how essential broadband is to maintain critical connections with family, education, healthcare, jobs, and more. YTV will use this funding to directly advance the FCC's goal of deploying voice and high-speed broadband-capable networks in rural, high-cost areas, while ensuring that rural communities benefit from innovations in communications technology.

In addition, designating YTV as an ETC in the requested service area will serve the public interest by making available robust fixed broadband Lifeline offerings with unlimited usage for low-income households in the RDOF-funded areas. Low-income households in the RDOF-funded areas will benefit from having additional choices for service available, particularly because that additional choice will provide a low-income household with fixed broadband services that significantly exceed the FCC's current minimum service standards for Lifeline.

V. ANTI-DRUG ABUSE CERTIFICATION

YTV certifies that neither the petitioner nor any party to the application is subject to a denial of federal benefits, including Commission benefits, pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, as implemented in section 1.2002 of the Commission's rules.²⁵

²⁵ 47 CFR § 1.2002; *see* Exhibit B (Krack Affidavit).

VI. CONCLUSION

For all of the foregoing reasons, YTV respectfully requests that the Commission designate it as a high-cost ETC for the areas set forth in Exhibit A so that it may be authorized to receive RDOF Phase I support on a timely basis.

Respectfully submitted,



Carol E. Matthey
Matthey Consulting LLC
5904 Devonshire Dr.
Bethesda, MD 20816

carol@mattheyconsult.com
(240) 461-7816

On Behalf of Youngsville Television Corporation
3 W. Main Street
Youngsville, PA 16371

January 6, 2021

EXHIBITS

EXHIBIT A:

LIST OF CENSUS BLOCKS IN WHICH YOUNGSVILLE TELEVISION CORPORATION SEEKS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

EXHIBIT B:

AFFIDAVIT OF DAVID KRACK, PRESIDENT, BOARD OF DIRECTORS, YOUNGSVILLE TELEVISION CORPORATION

EXHIBIT A

LIST OF CENSUS BLOCKS IN WHICH YOUNGSVILLE TELEVISION CORPORATION SEEKS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

Census Block ID	County	Census Block Group (Winning Bids)
420391101001004	Crawford	420391101001
420391101001005	Crawford	420391101001
420391101001007	Crawford	420391101001
420391101001010	Crawford	420391101001
420391101001021	Crawford	420391101001
420391101001026	Crawford	420391101001
420391101001028	Crawford	420391101001
420391101001030	Crawford	420391101001
420391101001032	Crawford	420391101001
420391101001033	Crawford	420391101001
420391101001034	Crawford	420391101001
420391101001035	Crawford	420391101001
420391101001036	Crawford	420391101001
420391101001037	Crawford	420391101001
420391101001038	Crawford	420391101001
420391101002003	Crawford	420391101002
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420391101002026	Crawford	420391101002
420391101002028	Crawford	420391101002
420391101002031	Crawford	420391101002
420391101002032	Crawford	420391101002
420391101002033	Crawford	420391101002

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EXHIBIT B

**AFFIDAVIT OF DAVID KRACK, PRESIDENT, BOARD OF DIRECTORS,
YOUNGSVILLE TELEVISION CORPORATION**

Commonwealth of Pennsylvania

) SS.

Warren County

David Krack, after being duly sworn, states the following:

1. I have personal knowledge of the facts and information set forth in this Affidavit, and I am competent to testify to these facts if called as a witness.
2. I am the President of the Board of Directors for Youngsville Television Corporation ("YTV"). Acting on behalf of YTV, 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. YTV certifies that it is a common carrier under sections 214(e)(1) and 214(e)(2) of the Communications Act of 1934 ("Act").
4. YTV commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier in the service area described in the Petition.
5. YTV certifies that it will meet all of the requirements for designation as an ETC set forth in section 214(e)(1) of the Act.
6. I am the corporate officer that will be responsible for certifying YTV's use of federal high-cost support.
7. YTV 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. YTV certifies that neither it nor any party to its application is subject to a denial of federal benefits, including Commission benefits, pursuant to section 5301 of the Anti-Drug Abuse Act of 1988, as implemented in section 1.2002 of the Commission's rules.



David Krack

President

Board of Directors

Youngsville Television
Corporation

NOTARY

Commonwealth of Pennsylvania

Warren County

This record was acknowledged before me on 1-5-2021 (date)

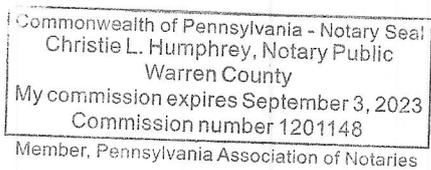
By David A. Krack (name of individual)

Notary signature: Christie L. Humphrey

Stamp:

My Commission expires on:

9-3-23



CERTIFICATE OF SERVICE

I, Carol E. Matthey, consultant to Youngsville Television Corporation, do hereby certify that I have filed the foregoing Petition for Designation as an Eligible Telecommunications Carrier by electronic mail delivery to:

Suzan D. Paiva
Assistant General Counsel
Verizon
900 Race Street, 6th Floor
Philadelphia, PA 19107
Suzan.d.paiva@verizon.com

John R. Evans
Small Business Advocate
Pennsylvania Office of Small Business Advocate
555 Walnut St., 1st Floor
Harrisonburg, PA 17101
jorevans@pa.gov

Tanya McCloskey
Acting Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut St., 5th Floor
Harrisonburg, PA 17101
tmccloskey@paoca.org

Barrett Sheridan
Assistant Consumer Advocate
Pennsylvania Office of Consumer Advocate
555 Walnut St., 5th Floor
Harrisonburg, PA 17101
bsheridan@paoca.org

and that, in filing the Petition, I have complied with the service requirements of the Pennsylvania Public Utility Commission.

This, the 6th day of January, 2021.

/s/ Carol E. Matthey
Matthey Consulting LLC
5904 Devonshire Dr.
Bethesda, MD 20816
Phone: (240) 461-7816
E-mail: carol@mattheyconsult.com