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January 29, 2021

VIA ELECTRONIC FILING

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

RE: Petition of Connect Everyone LLC, a wholly owned subsidiary of Starry, Inc. For Designation as an Eligible Telecommunications Carrier
Docket No. P- _____

Expedited Treatment Requested

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of Connect Everyone LLC, a wholly owned subsidiary of Starry, Inc. ("Starry") for designation as an Eligible Telecommunications Carrier ("ETC") in the Commonwealth of Pennsylvania.

Starry is seeking ETC designation because it was awarded funds under the FCC's Rural Digital Opportunity Fund Phase I Auction (Auction 904) ("RDOF Auction"). Pursuant to the RDOF rules, The FCC's deadline for Starry to submit appropriate documentation of the ETC designation is June 7, 2021. In order for Starry to have sufficient time to plan its RDOF construction and deployment schedule and meet the FCC's RDOF deadline, **Starry respectfully requests that the Commission grant Starry's ETC designation on an expedited basis by no later than May 6, 2021.**

Copies of the Petition have been served in accordance with the attached Certificate of Service. Should you have any questions, please feel free to contact me.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Certificate of Service

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New York • Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington
A PROFESSIONAL CORPORATION

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In the Matter of the Petition of Connect Everyone)
LLC, a Wholly-Owned Subsidiary of Starry, Inc.,)
for Designation as an Eligible Telecommunications) Docket No. _____
Carrier for Purposes of Rural Digital Opportunity)
Fund Phase I Support

**PETITION OF CONNECT EVERYONE LLC, A WHOLLY-OWNED SUBSIDIARY OF
STARRY INC., FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
CARRIER FOR RURAL DIGITAL OPPORTUNITY FUND PHASE I SUPPORT AND
REQUEST FOR EXPEDITED CONSIDERATION**

Connect Everyone LLC, a wholly-owned subsidiary of Starry, Inc. (collectively “Starry” or the “Petitioner”)¹ respectfully submits this Petition for Designation as a Eligible Telecommunications Carrier (“ETC”) to the Public Utility Commission of Pennsylvania (“Commission”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”);² 52 Pa. Code Section 69.2501 and Section 3019(f) of the Pennsylvania Public Utility Code; and Sections 54.201 and 54.202 of the Federal Communications Commission’s (“FCC’s”) rules.³ Starry requests this designation in connection with the high-cost support to serve the census blocks in Pennsylvania that it won through the FCC’s Rural Digital Opportunity Fund (“RDOF”) Phase I Auction 904 (“Auction”).⁴

¹ Connect Everyone LLC will be the ETC designation holder and recipient of RDOF funds, and Starry, Inc. will operate the service.

² 47 U.S.C. § 214(e)(2).

³ 47 C.F.R. §§ 54.201 and 54.202.

⁴ A list of the covered Census Blocks for which Starry is seeking ETC designation is attached as Exhibit A. This information is publicly available at https://auctiondata.fcc.gov/public/projects/auction904/reports/assigned_census_blocks. See also *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021*, Public Notice, 35 FCC Rcd 13888, Attach. A, 13911-912 (2020) (“RDOF Winning Bidder PN”).

Starry's receipt of RDOF Phase I support is conditioned upon obtaining this requested ETC designation from the Commission by June 7, 2021; therefore, **Starry respectfully requests expedited consideration and approval of this Petition by May 6, 2021 to ensure that it is eligible to obtain federal universal service fund ("USF") support to deploy its high-speed broadband network to continue to bring gigabit broadband service and voice service to thousands of residents across Pennsylvania.** For the reasons demonstrated herein, grant of this Petition is consistent with the rules and precedent of the Commission and FCC, and will serve the public interest.

I. INTRODUCTION

a. Company Background

Connect Everyone LLC ("Connect Everyone"), a Delaware Limited Liability Company, is a wholly-owned subsidiary of Starry, Inc., a Delaware Corporation, which exercises 100% direct control over Connect Everyone. Starry is a facilities-based Internet service provider that has offered service since 2017. Starry's network technology currently provides high-speed, low latency-service coverage to millions of households across six states and the District of Columbia.

Starry was founded on the belief that all consumers deserve access to better broadband, and its mission is to connect millions to affordable, reliable broadband by offering high-quality service at a competitive price with exceptional customer care. To do so, Starry developed a high-capacity, low-cost technology stack for last-mile fixed broadband.

Starry's fixed wireless technology has two key differentiators that enable its high-capacity, low-cost service. First, it operates in licensed millimeter wave spectrum, which has wide channel bandwidths for high capacity, and high power for range. Second, Starry developed its own fixed wireless technology that utilizes the IEEE 802.11 ecosystem for baseband radios

and Starry's own frequency conversion and smart antenna technology. Starry combines these capabilities to design and deploy networks that achieve low-cost, high-capacity last mile service using licensed millimeter wave point-to-multipoint fixed wireless. Using this technology, the FCC determined that Starry was qualified as a gigabit low-latency provider in Auction 904.

Starry currently offers an unlimited broadband service with no data caps and no long-term contracts, with a strong commitment to consumer privacy. As part of its mission to provide better broadband to all consumers, Starry also operates the "Starry Connect" program, which aims to improve connectivity and digital equity for individuals living in affordable housing by offering a low-cost and high-speed service to over 25,000 residents in public and private affordable housing.⁵ With RDOF support, Starry will continue to extend its service to thousands of additional consumers in Pennsylvania.

Starry holds spectrum licenses for the 24 GHz band in the Partial Economic Area of Harrisburg, Pennsylvania, and intends to rapidly deploy a hybrid fiber point-to-multipoint fixed wireless network to serve the locations in Pennsylvania won through the FCC's Auction 904. Starry will offer gigabit, low latency speeds and will provide its customers with voice grade access to the Public Switched Telephone Network ("PSTN") through an interconnected VoIP service via an integrated third-party VoIP vendor.

b. Background on the RDOF Phase I Auction (Auction 904)

The FCC established the RDOF Phase I Auction to award up to \$16 billion over 10 years to service providers that commit to offer voice and broadband services to fixed locations in

⁵ See Starry Connect, <https://starry.com/starryconnect>.

eligible unserved high-cost census blocks.⁶ These are areas that, based on current data, do not have access to broadband under the federal definition. Auction 904 is the FCC’s second auction to award ongoing high-cost universal service support through competitive bidding in a multiple-round, reverse auction, following the 2018 Connect America Fund (“CAF”) Phase II Auction (Auction 903). Similar to CAF Phase II, RDOF winning bidders that are authorized to receive support are required to offer voice and broadband speeds meeting relevant performance requirements to fixed locations in exchange for monthly support payments over a 10-year term. Such providers are also required to offer Lifeline services in their designated ETC service area. The FCC has imposed certain reporting requirements on RDOF support recipients, including reporting a list of geocoded locations each year to which the support recipient is offering the required services; making a certification upon meeting service milestones; and submitting an annual FCC Form 481 report to certify that the support recipient meets the FCC’s high-cost requirements.⁷

Applicants participating in the RDOF Phase I Auction were required to submit to the FCC a short-form application to demonstrate and certify that they are legally, technically, financially, and otherwise qualified to receive RDOF support. Based on such information, the FCC determined that Starry was eligible to participate in Auction 904 as a gigabit low-latency service provider. Starry, as Connect Everyone LLC, was ultimately assigned support to provide

⁶ *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Notice and Filing Requirements and Other Procedures for Auction 904*, Public Notice, 35 FCC Rcd 6077, 6080, para. 6 (2020) (“*RDOF Auction Procedures PN*”).

⁷ *Rural Digital Opportunity Fund et al.*, WC Docket No. 19-126, *et al.*, Report and Order, 35 FCC Rcd 686, 712-13, paras. 56-57 (2020) (“*Rural Digital Opportunity Fund Order*”).

service in nine states through the Auction 904 competitive bidding process, including Pennsylvania.⁸

c. Description of the Service Area for which ETC Designation is Sought

On December 7, 2020, Starry (as Connect Everyone) was announced as a winning bidder in Auction 904 for 2,203 census blocks (13,792 locations) in Pennsylvania and was assigned a total of \$24,513,988.00 over ten years for covered services in the state.⁹ Starry will deploy its network technology to provide gigabit low-latency broadband service and voice service to these census blocks. Starry is committed to providing high-quality service and exceptional customer care to customers in these areas.

As a condition of receiving this high-cost support, Starry must obtain an ETC designation from the Commission by June 7, 2021.¹⁰ The census blocks for which Starry is seeking designation in the state of Pennsylvania are listed in **Exhibit A** (and hereinafter referred to as the “Proposed ETC Service Area” or “RDOF Census Blocks”).¹¹ As described herein, grant of ETC designation will result in thousands of additional consumers in Pennsylvania receiving gigabit broadband service and voice service, and will serve the public interest.

In addition to the areas in which it is required to provide service, Starry will continue to build out and deploy networks across its spectrum footprint in Pennsylvania to cover millions of additional households, providing new connectivity and additional competitive choice to

⁸ *RDOF Winning Bidder PN*, Attach. A, 35 FCC Red at 13911-912.

⁹ *RDOF Winning Bidder PN*, Attach. A, 35 FCC Red at 13911-912. The assigned support will be disbursed monthly over a ten-year period.

¹⁰ *Id.* at 13892, fn. 15 (“By June 7, 2021, the long-form applicant must obtain from all the relevant states or the Commission a high-cost ETC designation(s) that cover its winning bid areas and upload the required documentation and a certification letter to its FCC Form 683.”); *see also* 47 U.S.C. § 214(e)(2).

¹¹ *See* Exhibit A.

Pennsylvania residents. At this time, Starry is only seeking ETC designation for the areas in which it won support as Connect Everyone LLC in Auction 904, as identified in Exhibit A, but may seek ETC designation for additional areas in the future.

Starry must provide a certification of ETC status with supporting documentation to the FCC within 180 days after the release of the *RDOF Winning Bidder Public Notice*, which is June 7, 2021.¹² For this reason, Starry seeks expedited review and consideration of its Petition for ETC designation as Connect Everyone LLC in the census blocks identified in Exhibit A.

II. COMMUNICATIONS AND CORRESPONDENCE

Pleadings, orders, notices or other correspondence and communications regarding this Petition should be provided to:

Michael Gruin
Stevens & Lee, P.C.
17 N. 2nd Street, 16th Floor
Harrisburg, PA 17101
Tel: (717) 255-7365
Email: mag@stevenslee.com

With copies to:
Brian Regan
Vice President - Legal/Policy/Strategy
Starry, Inc.
38 Chauncy Street
Second Floor
Boston, MA 02111
Tel: (617) 861-8300
Email: bregan@starry.com

III. THE COMMISSION HAS AUTHORITY TO GRANT THE DESIGNATION

The Commission has the authority to grant the ETC designation requested for the census blocks identified herein. Pursuant to Section 214(e)(2) of the Act, on its own motion or upon

¹² *RDOF Auction Procedures PN*, 35 FCC Rcd at 6166-67, para. 300.

request, a state commission may designate a common carrier that meets the requirements set forth in 47 U.S.C. § 214 (e)(1) as an eligible telecommunications carrier for the purposes of receiving universal service support.¹³ Section 214(e)(1) requires that state commissions, in reviewing such requests, ensure that the applicant: “(a) offers the services that are supported by the Federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier’s services, and (b) advertises the availability of such services and the charges therefor using media of general distribution.”¹⁴ These requirements are also set forth in the FCC rules including Sections 54.201(b) and (d).¹⁵ The Commission has exercised its jurisdiction to designate carriers as ETCs in Pennsylvania.¹⁶

The Commission’s regulations provide that ETC petitions in the Commonwealth are to be evaluated under 47 U.S.C. § 214(e) and the relevant rules and Orders of the FCC. The Commission’s regulations also provide that petitions for ETC designation seeking low-income support from Lifeline and Link-up America programs must satisfy the minimum standards established in 66 Pa.C.S. § 3019(f) and comply with the Commission’s Lifeline and Link-Up Order, *In Re: Lifeline and Link-Up Programs*, Docket No. M-00051871, Final Order, May 23, 2005 (“*PA Lifeline Order*”).¹⁷ The Commission’s *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, (Aug. 2, 2010) outlines the minimum standards that must be satisfied to be

¹³ 47 U.S.C. § 214(e)(2).

¹⁴ *Id.* §§ 214(e)(1) and (2).

¹⁵ 47 C.F.R. §§ 54.201(b) and (d).

¹⁶ *See, e.g.*, 52 PA. CODE § 69.2501.

¹⁷ 52 PA. CODE § 69.2501.

designated as an ETC in the Commonwealth, and the specific elements that must be included in an ETC petition.

As demonstrated herein, Starry meets all applicable requirements and its designation will serve the public interest by extending broadband internet and voice service to thousands of consumers in Pennsylvania including 47 U.S.C. § 214(e), 47 C.F.R. §§ 54.201 *et seq.*, 66 Pa. C.S. § 3019(f), 52 Pa. Code § 69.2501, and the Commission's orders setting requirements for ETCs and the provision of Lifeline service. The Commission should therefore grant this Petition.

IV. STARRY MEETS THE FEDERAL AND COMMONWEALTH STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION

As detailed below, Starry meets the criteria for designation as an ETC under the Act and applicable FCC and Commission rules.

A. Starry Meets All Federal Requirements for ETC Designation

1) Starry Will Provide Service as a Common Carrier (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d))

For purposes of this designation, Starry will offer interconnected VoIP service on a common carrier basis in the Proposed ETC Service Area. As such, with respect to the voice service it plans to deploy in the Proposed ETC Service Area, Starry is a common carrier.

2) Starry Will Offer the Services Supported by the Federal Universal Service Support Mechanisms (47 C.F.R. § 54.101)

RDOF support recipients are required to offer standalone voice service and offer voice and broadband services at rates that are reasonably comparable to rates offered in urban areas.¹⁸

¹⁸ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 707, para. 42.

As required by 47 C.F.R. § 54.101, Starry will offer the following voice telephony and broadband services that are supported by federal universal service support mechanisms:¹⁹

Voice Grade Access to the PSTN. Starry will meet this requirement through the provision of VoIP service that is interconnected to the PSTN, which will be offered as a standalone telephony service throughout its Proposed ETC Service Area.²⁰ The service will include minutes of use for local service provided at no additional charge to end users (specifically, Starry's service plans will offer unlimited usage within the United States); and access to emergency services via 911 and E-911, where implemented by local government or other public safety organizations. Starry will also provide toll limitation services to qualifying low-income consumers or may charge the same prices for toll and non-toll calls in accordance with the FCC's rules.²¹

Broadband Internet Access Services. Starry will offer broadband Internet access service that provides 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.²² Starry intends to offer gigabit low-latency broadband service using primarily licensed millimeter wave point-to-multipoint fixed wireless. End user connections will be routed to a local or regional point-of-presence, where Starry will interconnect through an Internet exchange point that carries traffic to all or substantially all Internet end points.

Starry commits to provide these services consistent with applicable high-cost universal service support rules and will meet the service requirements for RDOF Phase I support.²³ Starry will offer at least one standalone voice plan and one service plan that provides gigabit, low latency broadband. These plans will be offered at rates that are reasonably comparable to rates in urban areas.²⁴ Starry will be responsible for providing customer care, providing quality of service guarantees, and meeting the FCC's universal service fund-related requirements.²⁵

¹⁹ See 47 C.F.R. § 54.101.

²⁰ See *id.* § 54.101(b).

²¹ See *id.* § 54.101(a)(1).

²² See *id.* § 54.101(a)(2).

²³ See *id.* § 54.101(c).

²⁴ See *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 707-08, paras. 42-43.

²⁵ See *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, Public Notice, 33 FCC Rcd 6696, 6698

Starry also will make available Lifeline services to qualifying low-income consumers pursuant to the FCC’s rules at all locations in Pennsylvania where it is authorized to receive RDOF Phase I support.²⁶

3) Starry Will Provide Service Using Its Own Facilities or a Combination of its Own Facilities and Resale of Another Carrier’s Services (47 U.S.C. § 214(e)(1)(A), 47 C.F.R. § 54.201(d)(1))

Starry will primarily offer supported services using its own facilities, and may use a combination of its own facilities and resale of another carrier’s services depending on the deployment scenario.²⁷ Starry will have the exclusive right to use the broadband facilities it deploys to offer the supported services, and will integrate a managed VoIP service into its network through a third party. Depending on the deployment scenario, Starry may also utilize resale of another carrier’s fixed wireline services in addition to its own facilities in a census block. Therefore, Starry will offer the supported services using its own facilities or a combination of its own facilities and resale of another carrier’s services.²⁸

4) Starry Will Provide Service Throughout Its Designated Service Area (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d))

(WCB 2018) (“*ETC Designation Public Notice*”); see also *RDOF Auction Procedures PN*, 35 FCC Rcd at 6129, para. 139.

²⁶ See 47 C.F.R. §§ 54.101(d) and 54.405(a); see also *RDOF Auction Procedures PN*, 35 FCC Rcd at 6128, para. 137 (stating “[e]ach Auction 904 support recipient must offer Lifeline voice and broadband service throughout the eligible areas covered by its winning bids to qualifying low-income consumers pursuant to the Lifeline program rules.”).

²⁷ See 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1); see also *ETC Designation Public Notice*, 33 FCC Rcd at 6698 (“Facilities are the ETC’s ‘own’ if the ETC has exclusive right to use the facilities to provide the supported services or when service is provided by any affiliate within the holding company structure.”).

²⁸ 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1).

Starry commits to providing its services throughout the Proposed ETC Service Area, which consists of the census blocks identified in Exhibit A, consistent with all applicable requirements.²⁹

5) Starry Will Advertise the Availability of Its Services and Charges Using Media of General Distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2))

Starry will advertise the availability of and charges for its supported service offerings using media of general distribution, and will undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements. Starry will offer and advertise its voice and broadband services through various marketing channels, including but not limited to direct mail, email, local and community outreach events, and targeted online electronic advertising. In addition, Starry will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. And like Starry's current focus on affordability through its Starry Connect program, Starry will continue to develop partnerships with state and local organizations that are focused on digital equity and inclusion, including private and public affordable housing owners and agencies.³⁰

6) Starry Meets the Additional Requirements for Designation as an ETC (47 C.F.R. § 54.202)

Starry meets all of the applicable requirements for designation as an ETC under 47 C.F.R. § 54.202 as follows:³¹

²⁹ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).

³⁰ 47 C.F.R. § 54.405(b); *see* Starry Connect, <https://starry.com/starryconnect>.

³¹ The FCC waived the requirements for an Auction 904 winning bidder (a) to file a five-year plan as part of the ETC designation process, and (b) to demonstrate that it will satisfy applicable consumer protection and service quality standings. (47 C.F.R. §§ 54.202(a)(1)(ii) and (a)(3)). The FCC determined that such obligations were no longer essential to the FCC's ability to monitor ETC use of support for its intended purpose. *See RDOF Winning Bidders PN*, 35 FCC Rcd at 13901, fn. 71; *see also ETC Designation Public Notice*, 33 FCC Rcd at 6699-6700.

1. Compliance with Applicable Service and Performance Quality Requirements. Starry certifies that it will comply with the service and performance requirements applicable to the support that it receives, including the requirements for RDOF Phase I support.³²
2. Ability to Remain Functional in Emergency Situations. Starry has provided reliable high-speed Internet access service to customers since 2017. Starry certifies that its point-to-multipoint fixed wireless and fiber network will have the ability to remain functional in emergency situations, will have a reasonable amount of back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities, and will be capable of managing traffic spikes resulting from emergency situations. The deployed network will include backup power sources at fiber locations and at fixed wireless base stations serving voice customers to ensure at least 8 hours of backup power. Starry also will institute an operational plan that triggers the deployment of additional backup power generators in storage in locations that are less than 8 hours of drive time when accounting for adverse travel conditions. Starry will institute internal testing procedures to test backup generators and facilities at least annually, and after natural events in the area (i.e., blizzard, earthquake, flood). In addition, Starry will assist voice customers in the provision of backup power at their homes and businesses, including by making systems compatible with uninterruptible power supply solutions. Starry will maintain redundancy in the network by running fiber in two directions in most cases, and it will deploy point-to-point wireless redundant backhaul for fixed wireless sites as necessary. It will deploy a gigabit network that is designed for sufficient capacity for peak voice usage during times of emergency and will utilize Session Initiation Protocol VoIP technology to deliver fully functional voice services, including 911 capabilities, by integrating a managed VoIP product into its network.
3. Consumer Protection and Service Quality Standards Commitment. Starry commits to satisfy consumer protection and service quality standards to the extent applicable.³³
4. Build Plan. Starry certifies that it will provide service to the locations for which it is awarded Auction 904 support consistent with the deployment obligations associated with the receipt of RDOF Phase I support. The FCC has waived the requirement that a petitioner seeking an FCC ETC designation submit a five-year improvement plan and has also eliminated the annual reporting obligations associated with this plan.³⁴ The FCC determined that such requirements were no longer essential to the FCC's ability to

³² See 47 C.F.R. §§ 54.202(a)(1)(i) and 54.805.

³³ The FCC waived the requirements for an Auction 904 winning bidder (a) to file a five-year plan as part of the ETC designation process, and (b) to demonstrate that it will satisfy applicable consumer protection and service quality standings. (47 C.F.R. §§ 54.202(a)(1)(ii) and (a)(3)). The FCC determined that such obligations were no longer essential to the FCC's ability to monitor ETC use of support for its intended purpose. See *RDOF Winning Bidders PN*, 35 FCC Rcd at 13901, fn. 71; see also *ETC Designation Public Notice*, 33 FCC Rcd at 6699-6700.

³⁴ See *RDOF Winning Bidders PN*, 35 FCC Rcd at 13901, fn. 71; see also *ETC Designation Public Notice*, 33 FCC Rcd at 6699-6700.

monitor ETC use of support for its intended purpose due to the adoption of more specific measures to track deployment, including annual reporting of service to geocoded locations and certification of compliance with benchmark milestones.³⁵ In accordance with the FCC's ETC designation requirements applicable to winning bidders in the RDOF Phase I Auction, Starry respectfully requests that, to the extent necessary, the Commission similarly waive the requirement contained in the ETC designation application that ETC applicants file a service or improvement plan.

In addition, Starry will retain all records required to demonstrate to auditors that the support received is consistent with universal service high-cost program rules. Starry commits to maintaining this documentation for at least ten years from the receipt of funding.³⁶

B. Starry Meets All Commonwealth Requirements for ETC Designation

Starry meets all requirements under Pennsylvania statutory law and the Commission orders for designation as an ETC and for provision of Lifeline services in the RDOF Census Blocks in Pennsylvania, as follows.

i. Section 3019(f) Requirements

Section 3019(f) of the Pennsylvania Public Utility Code (Code), 66 Pa. C.S. § 3019(f), and the Commission's *PA Lifeline Order* set forth the minimum Pennsylvania requirements for ETCs seeking low-income support from the federal Lifeline Program. Section 3019(f) includes the following requirements for ETCs:

- 1) All eligible telecommunications carriers certificated to provide local exchange telecommunications service shall provide Lifeline service to all eligible telecommunications customers who subscribe to such service.

Starry will provide Lifeline service to all qualifying customers who reside in the RDOF Census Blocks and wish to subscribe to its Lifeline service in Pennsylvania.

³⁵ *ETC Designation Public Notice*, 33 FCC Rcd at 6699.

³⁶ 47 C.F.R. § 54.320(b).

- 2) All eligible telecommunications customers who subscribe to Lifeline service shall be permitted to subscribe to any number of other eligible telecommunications carrier telecommunications services at the tariffed rates for such services.

Starry will permit qualifying Lifeline subscribers residing in the RDOF Census Blocks to subscribe to all other non-Lifeline services offered by Starry in the RDOF Census Blocks at the standard rates for such services in Pennsylvania.

- 3) Whenever a prospective customer seeks to subscribe to local exchange telecommunications service from an eligible telecommunications carrier, the carrier shall explicitly advise the customer of the availability of Lifeline service and shall make reasonable efforts where appropriate to determine whether the customer qualifies for such service and, if so, whether the customer wishes to subscribe to the service.

Starry will advise prospective customers of the availability of Lifeline service within its Pennsylvania RDOF Census Blocks and will establish protocols for determining whether such customers residing in the Pennsylvania RDOF Census Blocks qualify for and wish to receive Lifeline service.

- 4) Eligible telecommunications carriers shall inform existing customers of the availability of Lifeline services twice annually by bill insert or message. The notice shall be conspicuous and shall provide appropriate eligibility, benefits and contact information for customers who wish to learn of the Lifeline service subscription requirements.

Starry will inform existing customers who reside in the RDOF Census Blocks of the availability of Lifeline services at least twice annually by bill insert or other message. Starry's notice to those customers will be conspicuous and provide eligibility, benefit, and contact information for customers who wish to learn of the Lifeline service subscription requirements.

- 5) Eligible telecommunications carriers shall provide the department of public welfare with Lifeline service descriptions and subscription forms, contact telephone numbers, and a listing of the geographic area or areas they serve, for use by the department of public welfare in providing the notifications required by this paragraph.

Starry will provide to the Pennsylvania department of public welfare its Lifeline service descriptions and subscription forms, contact telephone numbers, and a listing of RDOF Census Blocks that Starry serves.

- 6) No eligible telecommunications carrier shall be required to provide after the effective date of this section any new Lifeline service discount that is not fully subsidized by the federal universal service fund.

Starry acknowledges that it shall not be required to provide any Lifeline service discount that is not fully subsidized by the federal universal service fund.

ii. Other Pennsylvania Requirements and Relevant Reporting Requirements

Starry agrees to comply with the following Pennsylvania specific requirements with respect to its provision of Lifeline and other RDOF supported services in the RDOF Census Blocks:

- 1) Starry agrees to use the National Verifier when helping consumers in the RDOF Census Blocks apply for the Lifeline program;
- 2) Starry agrees to include a public education component as part of its Pennsylvania Lifeline outreach program to ensure that consumers in the RDOF Census Blocks are aware of, and can participate in, the eligibility determination from the National Verifier;
- 3) Starry agrees to comply with the FCC's reverification process that must occur to determine the continued eligibility of existing Pennsylvania Lifeline subscribers in the RDOF Census Blocks;

4) Starry agrees to ensure all of its Pennsylvania Lifeline subscribers in the RDOF Census Blocks are recertified either automatically through the National Verifier's state/federal data sources or a recertification request from USAC;

5) Starry agrees to report to the Commission annual changes in its Pennsylvania Lifeline enrollment in the RDOF Census Blocks;

6) Starry agrees to provide the Commission's Bureau of Consumer Services ("BCS") a copy of its annual Pennsylvania Lifeline verification results that is filed with USAC each year (Form 555), as well as the FCC Form 497 Pennsylvania Lifeline customer reporting worksheet (or any successor form) filed quarterly with USAC with respect to Starry's offering of Lifeline services in the RDOF Census Blocks;

7) Starry will offer operator services, directory assistance and interexchange access (long distance) to Pennsylvania Lifeline subscribers in the RDOF Census Blocks;

8) Starry agrees to comply with the standards and billing practices set forth in Commission regulations at 52 Pa. Code §§ 64.1-64.213 with respect to its provision of RDOF supported services in the RDOF Census Blocks;

9) Starry agrees to work with BCS to resolve informal complaints and to submit to the jurisdiction of the Commission for any formal complaints filed by Starry's Pennsylvania Lifeline customers regarding Lifeline issues, including (1) eligibility disputes, (2) program offering issues, and (3) limited equipment related issues;

10) Starry agrees to provide BCS with copies of all Pennsylvania Lifeline program advertising, promotional materials, and general customer notices and communications on an annual basis or upon request;

11) Starry will engage in advertising that is directed at promoting the availability of Lifeline to qualifying customers in the RDOF Census Blocks; and

12) Starry agrees that in the event of a change of or transfer of corporate control, as defined in Pennsylvania statutory law, case law, and 52 Pa Code § 63.322, Starry will petition the Commission for a renewal of its ETC status.

V. GRANT OF THIS PETITION WILL SERVE THE PUBLIC INTEREST

In January 2020, the FCC established the RDOF program upon its finding that millions of homes and businesses throughout the country lack access to broadband at the 25/3 Mbps standard.³⁷ As FCC Chairman Pai explained, “[t]his means that millions of Americans can’t start a business, advance their children’s and their own education, use precision agriculture, access telemedicine, or benefit from the digital economy [and this] demands the [FCC] take immediate, concrete action.”³⁸ A month after this statement was released, the need for action became even more evident as the COVID-19 pandemic impacted the nation in unprecedented ways, driving business, education, and many other activities online. It soon became clear that those without access to high-speed Internet services were at a severe disadvantage, falling further onto the “the wrong side of the digital divide.”³⁹ RDOF support is expected to be a critical component to ultimately bridging this gap.

In order for a winning bidder to receive RDOF funding, it must be designated as an ETC in the areas for which it has won support. Thus, designating Starry (as Connect Everyone) as an

³⁷ *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 690, para. 9.

³⁸ *Id.* at 778 (Statement of Chairman Pai).

³⁹ *Id.* at 779 (Statement of Chairman Pai); see Petula Dvorak, *When ‘back to school’ means a parking lot and the hunt for a WiFi signal*, WASH. POST (Aug. 27, 2020 at 3L47 pm GMT-5), https://www.washingtonpost.com/local/when-back-to-school-means-a-parking-lot-and-the-hunt-for-a-wifi-signal/2020/08/27/0f785d5a-e873-11ea-970a-64c73a1c2392_story.html.

ETC in the identified areas of Pennsylvania will serve the public interest by allowing Starry to support the FCC’s “top priority” of closing the digital divide by bringing essential connectivity to residents and businesses of Pennsylvania.⁴⁰ Specifically, RDOF targets federal support to areas that the FCC has determined lack access to both fixed voice and 25/3 Mbps broadband services⁴¹ and seeks to “ensure that [supported] networks stand the test of time by prioritizing higher network speeds and lower latency, so that those benefiting from these networks will be able to use tomorrow’s Internet applications as well as today’s.”⁴² As a winning bidder in Auction 904, Starry is eligible to receive nearly \$25 million over ten years to bring high-speed broadband and voice services to unserved areas of Pennsylvania. Expedited Commission action on this Petition serves the public interest by accelerating the deployment of high-quality, innovative voice and broadband Internet access services in unserved portions of Pennsylvania that Starry will serve in the RDOF Census Blocks.

Starry looks forward to offering a competitive high-quality, low-cost broadband option to consumers across Pennsylvania. As described herein, a fundamental component of Starry’s mission to connect all Americans to better broadband service, and grant of this Petition for ETC designation by June 7, 2021 will provide the opportunity to receive federal funding for use in Pennsylvania and to continue to serve the public interest through increased digital opportunity. In addition, ongoing investments in infrastructure in the state, along with increased consumer choice and competition with respect to these services, will serve the public interest. These benefits will increase innovation, stimulate productivity and efficiency, and offer new and

⁴⁰ *Rural Digital Opportunity Fund Order*, App’x. B, 35 FCC Rcd at 758, para. 2.

⁴¹ *Id.* at 690, para. 9.

⁴² *Id.* at 687, para. 2.

improved goods, services and providers to a wider range of residents and businesses. This will ultimately produce greater access to the FCC’s intended “future-proof” networks and improved service quality for Pennsylvania consumers.⁴³

VI. EXPEDITED REVIEW AND APPROVAL REQUESTED

As demonstrated herein, Starry satisfies the conditions of eligibility necessary for designation as an ETC in the identified areas of Pennsylvania listed in Exhibit A and such designation will serve the public interest and benefit residents and businesses in Pennsylvania. Due to the FCC’s requirement that Auction 904 winning bidders must certify their ETC designations to the FCC by June 7, 2021, Starry respectfully requests that the Commission expeditiously grant this Petition by no later than May 6, 2021 and designate Connect Everyone LLC as an ETC for the purpose of being eligible to receive \$24,513,988.00 in federal funding over a ten-year period to provide supported services in areas of Pennsylvania.

Respectfully Submitted,

Connect Everyone LLC, a wholly-owned subsidiary of Starry, Inc.



/s/ Brian Regan

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January 29, 2021

⁴³ In addition, the FCC also adopted a presumption that ETC designation serves the public interest, finding that bidders for high-cost support “demonstrate their ability to efficiently offer service through the FCC’s competitive bidding process while in their short-form and long-form applications, bidders demonstrate their ability to meet their public interest obligations.” *ETC Designation Notice*, 33 FCC Rcd at 6701.

**CONNECT EVERYONE LLC
PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

LIST OF EXHIBITS

**EXHIBIT A LIST OF CENSUS BLOCK IN WHICH CONNECT EVERYONE
LLC SEEKS ELIGIBLE TELECOMMUNICATIONS CARRIER
DESIGNATION**

EXHIBIT B VERIFICATION

**CONNECT EVERYONE LLC
PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

EXHIBIT A

**LIST OF CENSUS BLOCK IN WHICH CONNECT EVERYONE LLC SEEKS
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

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| 421330240011076 | 421330240021025 | 421330240021061 | |

**CONNECT EVERYONE LLC
PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

VERIFICATION

I, Brian Regan, am the Vice President – Legal, Policy, Strategy of Starry, Inc., the owner of Connect Everyone LLC. I have reviewed the foregoing Petition for Eligible Telecommunications Carrier Designation, and I verify that the information provided herein is 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 manner. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsifications to authorities.

Executed on January 22, 2021



Brian Regan
VP – Legal, Policy, Strategy
Starry, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2021 copies of the foregoing Petition for Eligible Telecommunications Carrier Designation have been served upon the persons listed below in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Via Electronic Mail and First Class U.S. Mail

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1921

Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Pennsylvania Public Utility Commission
Law Bureau
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Via First Class U.S. Mail only

Honorable Gladys Brown, Chairman
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

Honorable David W. Sweet Vice-Chairman
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

Honorable Ralph Yanora, Commissioner
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

Honorable John F. Coleman, Jr., Commissioner
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

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



Michael A. Gruin, Esq.