

STEVENS & LEE
LAWYERS & CONSULTANTS

17 North Second Street
16th Floor
Harrisburg, PA 17101
(717) 234-1090 Fax (717) 234-1099
www.stevenslee.com

Direct Dial: (717) 255-7365
Email: mag@stevenslee.com
Direct Fax: (610) 988-0852

March 30, 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-2021-3023915

Dear Secretary Chiavetta:

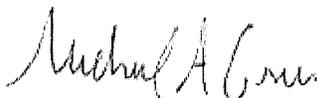
Enclosed please the verified responses of Connect Everyone LLC, a wholly owned subsidiary of Starry, Inc. ("Starry") to the Data Requests issued in the above-captioned matter.

Please note that the responses to requests 10, 11, 22, 24, 25, 26 and 28 contain commercially sensitive and proprietary business and operational information, and have been marked Confidential, and Starry respectfully requests that they be treated accordingly.

Should you have any questions, please feel free to contact me.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosure

VERIFICATION

I, Brian Regan, holding the position of Vice President – Legal, Policy, Strategy, with Starry, Inc., verify that the information provided in the foregoing responses to data requests 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 matter. 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.

/s/ Brian Regan

Name: Brian Regan

Title: Vice President – Legal, Policy, Strategy

Date: March 29, 2021

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

1. Describe how Connect Everyone will structure staff assignments to assist low-income consumers. Or will the company outsource customer service, recordkeeping and other Lifeline-related activities? 47 CFR § 54.406.

RESPONSE TO QUESTION 1: Starry's first priority is to provide an exceptional customer experience to all customers, regardless of their Starry service plan. Starry provides customer service 24x7x365 with an in-house team that works remotely throughout the United States, and that integrates with Starry's in-market team for any issues that require a visit to a customer's premises. Customers can access customer service through Starry's website, by calling a toll-free number ((888) 231-9403), and through the Starry mobile application. These same avenues will be available for Lifeline subscribers and our in-house staff will be trained to support any issues.

Customer service that is accessed over the phone is a live service. In addition, there are frequently asked questions available on Starry's website (<https://support.starry.com/hc/en-us>) and there is also an automated chatbot hosted on the website that can resolve basic customer service issues. In the event of a planned outage or an outage caused by weather or other unplanned event, Starry will contact customers through e-mail to inform them of the outage. In the future, Starry may utilize some automated voice services to provide information in a timely manner in the event it is necessary

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

2. Will Lifeline subscribers choose from services generally available to the public? Or will Connect Everyone have specific offerings for Lifeline subscribers? Does Connect Everyone agree to provide Lifeline service that complies with FCC minimum service standards for Lifeline service as published annually? Provide a description of the different service options available to Lifeline subscribers that satisfy minimum service standards. 47 CFR §§ 54.101(d), 54.401, 54.403(b), 54.408. Link to DA 20-820: [Lifeline Minimum Service Standards Effective 12/01/2020](#)

RESPONSE TO QUESTION 2: Starry is currently developing the specifics of its service plans that it will offer within its RDOF footprint, including its Lifeline plan. However, it is expected that Lifeline subscribers will be able to choose from a variety of service tiers that are available to all consumers, in addition to Lifeline-qualifying plans. Starry believes in providing customers with the choice to pick the speed and price tier that best meets their needs. If a customer qualifies for Lifeline, they may choose a Lifeline plan, but they may also choose another standard Starry plan. Starry agrees to provide Lifeline service that complies with FCC minimum service standards for Lifeline service. Starry will file a Supplemental response with a price list and set of proposed service offerings for its Lifeline services as soon as practicable.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

3. Describe how Connect Everyone will satisfy 66 Pa.C.S. § 3019(f) Lifeline service. Provide a mockup of a conspicuous biannual bill insert or message that includes eligibility, benefits, and contact information for customers who wish to learn about Lifeline service.* 66 Pa.C.S. § 3019(f)(4).

RESPONSE TO QUESTION 3: Starry is currently developing its plans that it will offer within its RDOF footprint, including its Lifeline plan. Starry will file a Supplemental response with a mockup of the Company's biannual bill insert and/or eligibility, benefits, and contact information for customers who wish to learn about its Lifeline services as soon as practicable.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

4. Per 47 CFR § 54.405(b), describe how Connect Everyone will perform outreach other than through media of general distribution. Provide a mockup of marketing material for general distribution that the company will use to publicize the availability of Lifeline service.* This can be current advertisement modified to comply w/Lifeline rules. Be sure to include standalone voice service as an option, and include offering(s) that satisfy Lifeline minimum service standards and pricing. 47 CFR §§54.101, 54.201(d)(2), 54.401(d), 54.408. 52 Pa. Code § 69.2501.

RESPONSE TO QUESTION 4: Starry is currently developing its plans that it will offer within its RDOF footprint, including its Lifeline plan. Starry will file a Supplemental response with a mockup of the Company's advertising materials for its Lifeline service as soon as practicable.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

5. Provide a copy of the company's terms and conditions applicable to generally available voice and broadband service for plain language review. Include backup power disclosure. Provide a mockup of terms and conditions applicable to Lifeline service. * This can be in the form of an addendum to generally available terms and conditions. 47 CFR §§ 8.1(a), 9.20, 54.101(d), 54.401(d), 54.422(a)(2). 52 Pa. Code § 69.2501. Indicate how Connect Everyone will comply with the CTIA Consumer Code for Wireless Service. 47 CFR § 54.202(a)(3).

RESPONSE TO QUESTION 5: Starry is currently developing its plans that it will offer within its RDOF footprint, including its Lifeline and voice plans. Starry will file a Supplemental response with a set of proposed terms and conditions for its voice and Lifeline services as soon as practicable.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

6. Will Connect Everyone include the following phrase on all public Lifeline information?
Contact the PA PUC Bureau of Consumer Services for help with unresolved questions or complaints at 1-800-692-7380 or Online Informal Complaint Form

RESPONSE TO QUESTION 6: Yes.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

7. Upon obtaining designation as an ETC, BCS may occasionally request copies of bill messages and/or materials designed to inform customers who wish to learn about Lifeline service. Explain how Connect Everyone will provide marketing material, terms and conditions, and other public documents in languages other than English? 47 CFR §§ 54.201(d)(2), 54.404(b)(9), 54.405(c), (e), (3) and (4)

RESPONSE TO QUESTION 7:

Starry offers customer assistance and advertising materials in English and Spanish, and has tailored service to communities that it serves in which the residents predominantly speak a language other than English. Starry's customer service team is an in-house team. Starry designed its network from the ground up to provide its customer service team visibility into any issues on the customer's network, and they can troubleshoot most issues over the phone. In cases in which they cannot, they will create a service ticket that will trigger an additional level of troubleshooting, and if necessary result in a local field technician inspecting and resolving the issue in person at the customer's home. Starry's customer service is one of the ways it seeks to differentiate itself from other internet service providers, and Starry prides itself on its ability to quickly respond to and resolve customer issues.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

8. Provide a draft of Connect Everyone's policies and procedures regarding household eligibility for Lifeline that includes accessing NLAD for certification, recertification, de-enrollment, de-enrollment for non-usage, dispute resolution, non-transferable benefit, etc.* Include dispute procedures. 47 CFR §§ 54.405, 54.409, 54.410.

RESPONSE TO QUESTION 8: Starry will use Lifeline National Eligibility Verifier, for verification and certification of customer eligibility. Starry will adhere to all FCC Lifeline rules, including but not limited to requirements for Lifeline eligibility, recertification, de-enrollment, dispute resolution and non-resolution of benefits.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

9. Does the company's credit and deposit practice satisfy 47 CFR § 54.401(c)? Under which circumstances will Connect Everyone require a deposit from Lifeline applicants? Please provide a copy of Connect Everyone's credit and deposit practice.

RESPONSE TO QUESTION 9: Yes, Starry's credit and deposit practices will satisfy 47 C.F.R. § 54.401(c). While Starry is still developing its service plans, it does not currently conduct credit checks and is unlikely to do so for Lifeline subscribers, and it does not currently require any deposit and is unlikely to do so for Lifeline subscribers.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

12. VoIP providers: Provide a sample or mockup of an emergency services 911 warning label or describe other conspicuous means to notify subscribers. 47 CFR § 9.11(b)(5)(iii).

RESPONSE TO QUESTION 12: Starry is currently developing the specifics of its voice plans for its RDOF service areas, and will file a Supplemental response to Question 12 as soon as practicable.

13. What equipment, if any, does a subscriber need to obtain and maintain voice and/or broadband service? If company-owned or leased equipment is required, please provide warranty information. Indicate related charges, if any.

RESPONSE TO QUESTION 13: Starry subscribers receive a Wi-Fi modem and router (either separately or combined) as part of their service. Starry would not separately charge Lifeline subscribers for access to or use of that equipment, so long as it is returned at the termination of the service with Starry. Starry does not currently charge an installation fee and does not intend to charge any start-up, connection, disconnection, cancellation, or any other fees for future Lifeline service. Since its inception, Starry's mission has been to provide a better broadband experience to its subscribers. Consistent with that mission, Starry currently offers a low-cost service to residents living in its service territory who live in public or private affordable housing. That service is provided at low cost, and without any additional fees; it will serve as the basis of Starry's Lifeline service.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

14. Provide a list of charges for services and equipment necessary to establish and maintain Lifeline voice and/or broadband service. Identify the vertical services included at no additional charge, e.g. voicemail, caller I.D., and the charges for optional vertical services. 47 CFR §§ 54.201(d)(2), 54.401(b). Will Connect Everyone comply with annual results of the Urban Rate Survey published annually by the FCC? Urban Rate Survey Orders and Public Notices

RESPONSE TO QUESTION 14: Starry subscribers receive a Wi-Fi modem and router (either separately or combined) as part of their service. Starry would not separately charge Lifeline subscribers for access to or use of that equipment, so long as it is returned at the termination of the service with Starry. Starry is currently developing the specifics of its Lifeline service and will file a response to this question with additional information as soon as practicable. Starry will comply with the Urban Rate Survey published annually by the FCC.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

15. Which charges/fees will the company waive for Lifeline subscribers, if any, e.g. porting, toll-blocking, installation, battery backup, etc.? See also 47 CFR § 54.401.

RESPONSE TO QUESTION 15: Starry is developing the specifics of its Lifeline service and will provide additional information in response to this question as soon as practicable.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

16. Does Connect Everyone intend to offer Lifeline service on a prepaid or postpaid basis? Describe intended billing and payment options available to Lifeline subscribers. 52 Pa Code Chapter 64. Note that 52 Pa. Code § 53.85 prohibits a paper billing fee.

RESPONSE TO QUESTION 16: Starry is developing the specifics of its Lifeline service and will provide additional information in response to this question as soon as practicable.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

17. When does Connect Everyone anticipate it will begin to offer Lifeline in designated service areas? Pennsylvania ETCs are required to annually report enrollment and disconnections data using the Lifeline Tracking portal. The Lifeline Tracking Report is due on or before June 30. Carriers are to inform BCS when the company begins to provide service, and to request access to the online reporting portal by sending an email to BCS staff at RA-PCTELCO-PA@pa.gov.

RESPONSE TO QUESTION 17: If granted ETC status, Starry expects to begin offering Lifeline Service in some of its authorized census blocks in 2022, depending on the timing of the FCC's authorization, and consistent with Starry's service obligations under RDOF. Starry expects its Lifeline landing page to be available approximately 6 months after the FCC authorizes its RDOF support for Pennsylvania.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

18. Has Connect Everyone obtained any waivers or exceptions from the FCC pertaining to high-cost or low-income support?

RESPONSE TO QUESTION 18: Starry has not obtained any waivers or exemptions from the FCC pertaining to high-cost or low-income support.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

19. When did or will Connect Everyone contact which municipalities in its service areas to arrange for the provision of 911/E911 emergency service? Is an E911 feature included with standalone and bundled voice service? Will Lifeline subscribers have access to 911/E911 emergency service if service is suspended?

RESPONSE TO QUESTION 19: Starry is developing the specifics of its RDOF offerings, including Lifeline service, and will provide additional information in response to this question as soon as practicable. Starry looks forward to continuing to develop and expand relationships with municipalities in its RDOF service areas, particularly with regard to the provision of 911/E911 emergency services.

20. What is the company's procedure when responding to service requests and complaints, e.g. response time, warranted equipment, contractors? The PUC's BCS handles consumer complaints and inquiries informally – primarily, but not limited to 52 Pa. Code Chapters 63 and 64. Please provide details about Connect Everyone's procedure for managing billing disputes and service complaints, i.e. 800# for customer service, intake practices, steps to resolution, and when a customer will be referred to BCS. Please provide contact information that BCS will use in the event BCS receives an informal complaint.

RESPONSE TO QUESTION 20: Starry's customer service team is an in-house team that works with Starry's field technicians in each market to resolve customer issues that require a visit from a technician. Starry designed its network from the ground up to provide its customer service team visibility into any issues on the customer's network, and they can troubleshoot most issues over the phone. In cases in which they cannot, they will create a service ticket that will trigger an additional level of troubleshooting, and if necessary result in a local field technician inspecting and resolving the issue in person at the customer's home. Starry's customer service is one of the ways it seeks to differentiate itself from other internet service providers, and Starry prides itself on its ability to quickly respond to and resolve customer issues.

Contact information is as follows:

Brian Regan
Vice President, Legal/Policy/Strategy
Starry, Inc.
38 Chauncy Street, Suite 200
Boston, MA 02111
E-Mail: bregan@starry.com with cc: to etc@starry.com
Tel: (617) 861-8300

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

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

Per 66 Pa.C.S. § 3019(f)(5), ETCs are to supply the Pennsylvania Department of Human Services (PA DHS) with Lifeline service descriptions*, marketing material*, contact information, and a listing of service areas. Forward this information to

Mr. Frank Slenker, Human Services Program Specialist Supervisor (HSPSS)
Department of Human Services, OIM Bureau of Policy
1006 Hemlock Drive
Harrisburg, PA 17110
Phone: 717-705-8292
Email: RA-PWDFPPMAILBOX@pa.gov

RESPONSE TO QUESTION 21: Contact information is as follows:

Brian Regan
Vice President, Legal/Policy/Strategy
Starry, Inc.
38 Chauncy Street, Suite 200
Boston, MA 02111
E-Mail: bregan@starry.com with cc: to etc@starry.com
Tel: (617) 861-8300

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

23. Regarding voice service, Connect Everyone will offer unlimited usage within the United States. Please clarify if this includes the contiguous 48 states or 50 states and territories?

RESPONSE TO QUESTION 23: Starry is currently developing the plans that it will offer within its RDOF footprint, including its voice offerings, and will provide additional information in response to this question as soon as practicable.

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

27. Please include the company's registration with the Department of State of Pennsylvania.

RESPONSE TO QUESTION 27: See attached as Exhibit D

Exhibit D

Pennsylvania Department of State Registration

**PENNSYLVANIA DEPARTMENT OF STATE
 BUREAU OF CORPORATIONS AND CHARITABLE ORGANIZATIONS**

Document will be returned to the name and address entered below. CT Corporation System CT Corporation System	Foreign Registration Statement DSCB: 15-412 (rev. 2/2017)
Name 4400 EASTON CMNS WAY STE 125,	
Address COLUMBUS PA 43219	412
City State Zip Code	

Read all instructions prior to completing. This form may be submitted online at <https://www.corporations.pa.gov/>.

Fee: \$250.00 I qualify for a veteran/reservist-owned small business fee exemption (see instructions)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. § 412 (relating to foreign registration statement), the undersigned foreign association hereby states that:

1. The type of association is (check only one):

- | | | |
|---|--|---|
| <input type="checkbox"/> Business Corporation | <input type="checkbox"/> Limited Partnership | <input type="checkbox"/> Business Trust |
| <input type="checkbox"/> Nonprofit Corporation | <input type="checkbox"/> Limited Liability (General) Partnership | <input type="checkbox"/> Professional Association |
| <input checked="" type="checkbox"/> Limited Liability Company | <input type="checkbox"/> Limited Liability Limited Partnership | |

2. The full and proper name of the foreign association as registered in its jurisdiction of formation is:

Connect Everyone LLC

2A. If the name in 2 does not contain a required designator or if the name in 2 is not available for use in the Commonwealth, the alternate name under which the association is registering in this Commonwealth is:

3. The jurisdiction of formation: DE

4. The street and mailing address of the association's principal office.

38 Chauncy Street, Suite 200,	Boston	MA	02111
Number and street	City	State	Zip

4A. The street and mailing address of the office, if any, required to be maintained by the law of the association's jurisdiction of formation in that jurisdiction:

c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street	Wilmington	DE	19801-1120
Number and street	City	State	Zip

Responses of Connect Everyone, LLC to Bureau of Consumer Services Data Requests
Docket No. P-2021-3023915

29. Does the company intend to file a lifeline tariff?

RESPONSE TO QUESTION 29: Because Staff will not be offering a Lifeline voice service as a certificated voice carrier Starry does not plan on filing a Lifeline tariff.