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April 28, 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 Set II Data Requests issued in the above-captioned matter.

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

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosure

Responses of Connect Everyone LLC, subsidiary of Starry, Inc. to
Bureau of Consumer Services (BCS) - Second Data Requests
Docket No. P-2021-3023915
Petition for Designation as an Eligible Telecommunications Carrier (ETC)
Under [52 Pa. Code § 69.2501](#) and [PA Title 66 Chapter 30](#)

1. Please provide contact information for Starry staff responsible for preparing and submitting reports to the PUC.

Response:

Brian Regan
Senior Vice President, Strategy & Chief of Staff
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

2. To satisfy 66 Pa.C.S. § 3019(f)(3), will Starry add the following to its customer service training for Pennsylvania customers:

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.

Response:

Yes, Starry will add this language to its customer service training for Pennsylvania customers.

3. In its March 30, 2021 response to the BCS March 1, 2021 Data Requests (DR1) #9, Starry does not currently conduct credit checks or require any deposit. Does this apply to both voice *and* broadband service?

Response:

Starry's mission is to connect millions of consumers to better broadband by offering high-speed, low-cost service with exceptional customer care. Starry does not currently conduct credit checks nor require any deposit, and plans to continue to uphold these principles in future offerings for both broadband and voice service.

4. In its March 30, 2021 response to the BCS March 1, 2021 DR1 #17, Starry expects to begin offering Lifeline in some of its authorized census blocks in 2021. Please clarify what is meant by "some." Upon authorization to receive RDOF funding, will Starry begin to offer voice service in RDOF-funded areas through resale? Please explain.

Response:

Starry is currently planning its network and service offerings in its RDOF Phase I footprint. As the network deployment takes some time and will roll out incrementally within the FCC's build out

timelines, parts of census blocks will receive service before other parts. As Starry builds the network and launches its service, it will offer Lifeline in the authorized census blocks concurrently as part of its service launch. Starry references its detailed technology and system design with buildout plan, which was previously submitted as confidential "Exhibit A - Description of Technology and System Design with Buildout Plan," which provides significant technical detail about Starry's network technology, deployment model, and network design for the State. Starry clarifies that the time within which it will begin to offer voice service is a function of when the FCC authorizes Starry's support and the deployment schedule for Starry's network consistent with the FCC's buildout requirements.

5. Please confirm that Starry will offer the availability of Lifeline at the time it begins to offer voice service.

Response:

Yes, Starry will offer the availability of Lifeline service at the time it begins to offer voice service to its Auction 904 service areas in Pennsylvania.

6. In its March 30, 2021 response to the BCS March 1, 2021 DR1 #20, Starry states its customer service team has 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. For voice service, will Starry comply with 52 Pa. Code § 63.57?

Excerpt from 52 Pa. Code § 63.57 *Customer trouble reports*.

(a) A public utility shall respond to and take substantial action to clear out-of-service trouble of an emergency nature whenever the outage occurs, within 3 hours of the reported outage consistent with the needs of customers and personal safety of utility personnel.

(b) A public utility shall respond to and take substantial action to clear other out-of-service trouble, not requiring unusual repair, within 24 hours of the report, except for isolated weekend outages affecting fewer than 15 customers in an exchange or where the customer agrees to another arrangement

Response:

Yes, Starry will comply with 52 Pa. Code § 63.57.

7. Please provide a mailing address and 800# to Starry's customer service team that will appear in the PUC's publication, *Stay Connected* that is linked here -

<http://www.puc.pa.gov/Telecom/pdf/Lifeline%20Brochure-StavConnected.pdf>

Contact information for Starry's customer support team is as follows:

Attn: Starry Customer Support
38 Chauncy Street
Second Floor
Boston, MA 02111
Email: support@starry.com
Tel: 888-231-9403

8. Is Starry's Internet Service Provider (ISP) disclosure available on a publicly accessible website to all consumers, including consumers with disabilities. Please provide a link to Starry's publicly accessible ISP disclosure.

Response:

Yes, Starry's Terms & Conditions, including its network management practices and commercial terms are publicly accessible and can be accessed at <https://starry.com/legal>.

9. Does Starry certify that neither Starry nor any party to its petition is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988?

Response:

Yes, Starry certifies that neither Starry nor any party to its petition is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.

10. In its March 30, 2021 confidential response to the BCS March 1, 2021 DR1 #11, Starry intends to provide a subscriber disclosure regarding the customer's ability to attach backup power to the VoIP system, and will provide the technical capability and support to do so. . . . Starry will assist voice customers in the provision of backup power at their home and businesses, including by making its system compatible with uninterruptible power supply solutions. To provide 911 access, please clarify that Starry will offer at point of sale to provide *or* offer for sale an eight-hour and twenty-four-hour backup power component that includes installation by Starry.

Response:

Yes, Starry will offer at the point of sale to provide, or offer for sale, an eight-hour and twenty-four hour backup power component that includes installation by Starry.

VERIFICATION

I, Brian Regan, holding the position of Senior Vice President, Strategy & Chief of Staff, 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: SVP, Strategy & Chief of Staff

Date: April 28, 2021