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May 11, 2021

*Via Electronic Filing*

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

In re: PaPUC Docket No. P-00971281  
Joint Petition of Commonwealth Telephone Company LLC d/b/a Frontier  
Communications Commonwealth Telephone Company; Frontier Communications  
of Breezewood, LLC; Frontier Communications of Canton, LLC; and Frontier  
Communications of Pennsylvania, LLC, For Expansion of Eligible  
Telecommunications Carrier Status to Include Additional Census Blocks

Dear Secretary Chiavetta:

We are counsel to Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; and Frontier Communications of Pennsylvania, LLC and are submitting with this letter, via electronic filing, their Supplement to Joint Petition for Expansion of Eligible Telecommunications Carrier Status to Include Additional Census Blocks.

A copy of the Supplement to Joint Petition is being served upon the persons and in the manner set forth on the certificate of service attached to it.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

cc: Certificate of Service (w/encl.)  
Frederick Thomas, Esq. (via email, w/encl.)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of:

Docket No. P-00971281

Commonwealth Telephone Company LLC d/b/a  
Frontier Communications Commonwealth  
Telephone Company;  
Frontier Communications of Breezewood, LLC;  
Frontier Communications of Canton, LLC; and  
Frontier Communications of Pennsylvania, LLC

For Expansion of Eligible Telecommunications  
Carrier Status to Include Additional Census Blocks

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**SUPPLEMENT TO JOINT PETITION FOR EXPANSION OF ELIGIBLE  
TELECOMMUNICATIONS CARRIER STATUS TO INCLUDE  
ADDITIONAL CENSUS BLOCKS**

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AND NOW, come Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company, Frontier Communications of Breezewood, LLC, Frontier Communications of Canton, LLC, and Frontier Communications of Pennsylvania, LLC, (collectively, "Frontier Petitioners"), by their undersigned counsel, and file with the Pennsylvania Public Utility Commission (the "Commission") this Supplement ("Supplement to Joint Petition") to their Joint Petition for Expansion of Eligible Telecommunications Carrier ("ETC") Status to Include Additional Census Blocks ("Joint Petition"). In support thereof, Frontier respectfully submits the following:

1. On January 5, 2021, Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company, Frontier Communications of Breezewood, LLC, Frontier Communications of Canton, LLC, and Frontier Communications of Pennsylvania, LLC filed their Joint Petition for expansion of their ETC status.

2. Frontier had been awarded federal subsidies through the Federal Communications Commission's ("FCC") Rural Digital Opportunity Fund ("RDOF") Phase I auction. As a condition of receiving RDOF Phase I subsidies, the FCC effectively required in its December 7, 2020 Public

Notice that Frontier seek expanded ETC status by January 6, 2021.<sup>1</sup> The FCC’s Public Notice also requires that the expanded ETC status be obtained by June 7, 2021.<sup>2</sup>

3. Frontier Petitioners asked the Commission to amend their ETC Designations to include the additional census blocks attached as Exhibit A to the Joint Petition. Collectively, the expanded ETC designated area will add approximately 1,470 households to Frontier Petitioners’ existing ETC designated area. The locations in the census blocks are largely rural in nature.

4. Some of the RDOF census blocks won by Frontier and assigned to the Frontier Petitioners fall outside of the authorized service areas of the Frontier Petitioners. There are 260 of these incremental RDOF census blocks (“Incremental CBs”) and they are listed in Exhibit A attached to this Supplement to Joint Petition.

5. As identified by Frontier Petitioners in response to Staff data requests, the local exchanges associated with the newly-awarded census blocks that are outside of Frontier Petitioners’ existing service area appear to be as follows based on the limited data presently available: Bloomsburg (Verizon Pennsylvania, LLC (“Verizon PA”)), Carbondale (Verizon PA), Chapman Lake (Verizon North, LLC (“Verizon North”)), Clearville (The United Telephone Company, d/b/a CenturyLink (“CenturyLink”)), Clifford (North-Eastern Pennsylvania Telephone Company), Halifax (Verizon PA), Hopewell (CenturyLink), McConnellsburg (CenturyLink), Mercersburg (CenturyLink), Orbisonia (CenturyLink), Oxford (Verizon PA), Plymouth (Verizon PA), Roseville (North Penn Telephone Company), Shade Gap (CenturyLink), Strasburg (Verizon PA), Trout Run (Verizon North) and Whitehaven (Verizon PA).

6. Through this Supplement to Joint Petition, Frontier Petitioners supplement the Joint Petition to request ETC designation in the Incremental CBs for Frontier’s competitive local exchange carrier (“CLEC”), CTSI, LLC d/b/a Frontier Communications CTSI, LLC (“CTSI”) and include the addition of CTSI as a joint petitioner. CTSI joins in the request for ETC designation in the Incremental CB area.

7. CTSI is a Pennsylvania corporation with its principal offices based in Dallas, Pennsylvania. It is a facilities-based CLEC offering bundled local, long distance telephone, vertical services, DSL, and Internet access in the service territories of Verizon PA, Verizon North and CenturyLink, and an interexchange carrier reseller in Pennsylvania pursuant to Certificates of Public Convenience at A-311095. CTSI provides competitive local exchange service to approximately 7,245 residential and commercial customers with 42,628 access lines in 18 Pennsylvania counties.

8. During 2021, CTSI will apply to expand its CLEC territory to include any Incremental CBs for which it is not presently authorized to serve, which based on presently available information are only those eight census blocks in the service territories of North Penn Telephone Company and North-Eastern Pennsylvania Telephone Company (see **Exhibit B** attached to this Supplement to Joint Petition).

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<sup>1</sup> “Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes”, Public Notice, Appendix C, *available at* <https://docs.fcc.gov/public/attachments/DA-20-1422A4.pdf>, p. 19 (Dec. 7, 2020) (explaining carrier will be determined to make a reasonable effort to obtain ETC certification if it files within 30 days of Public Notice).

<sup>2</sup> *Id.*

9. CTSI meets the requirements for ETC designation for purposes of the FCC's RDOF program.

10. CTSI is a common carrier, as defined under the Communications Act of 1934, as amended,<sup>3</sup> and plans to offer the services required by RDOF in the Incremental CBs under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's or affiliate's facilities and services. CTSI also plans to advertise the availability of such services and the charges using media of general distribution.

11. Pursuant to Section 54.101 of the FCC's rules, eligible voice telephony services include voice grade access to the PSTN or its functional equivalent.<sup>4</sup> For RDOF Phase I support recipients, the FCC also defines the supported service as qualifying voice service and conditions grant of funding on the offering of qualifying broadband service.

12. For RDOF purposes, CTSI, itself or through facilities and services of another carrier/affiliate, will provide voice service on a stand-alone basis in the Incremental CBs consistent with the FCC's high-cost universal service support rules applicable to it. CTSI primarily will be provisioning voice telephony, where requested by a customer, using Voice-over-Internet Protocol ("VoIP") technology.<sup>5</sup> CTSI's telephony voice service will include access to emergency services (including 911 or E911 where available) to locations in the areas listed in Exhibit B.

13. CTSI will offer Lifeline discounts to qualifying low-income consumers in the Incremental CBs consistent with the FCC's Lifeline rules.<sup>6</sup> CTSI, through its affiliate Frontier, has substantial experience in providing Lifeline services and qualifying low-income consumers for Lifeline services.

14. CTSI, itself or in conjunction with an affiliate, will advertise the availability of its Lifeline service offerings in the Incremental CBs using media reasonably designed to reach those likely to qualify for the service(s).

15. In Pennsylvania, entities requesting ETC designation also shall satisfy the Lifeline-related requirements as addressed by statute. 66 Pa.C.S. § 3019(f). Moreover, the Commission by regulation and orders has addressed various issues related to federal Lifeline and Link-Up programs.<sup>7</sup>

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<sup>3</sup> A "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).

<sup>4</sup> 47 C.F.R. § 54.101(a).

<sup>5</sup> See, 73 P.S. § 2251.4 - § 2251.6 (Voice-Over-Internet Protocol Freedom Act). CTSI and its affiliates respectfully reserve all rights, claims and defenses relating to non-jurisdictional technologies that may be used to provision services under the RDOF Auction. Any reference to or use of such technologies herein should not be construed as a waiver of any rights, claims, and defenses that may be asserted in the future.

<sup>6</sup> See 47 C.F.R. §§ 54.101(c), 54.805-54.806.

<sup>7</sup> See 52 Pa. Code § 69.2501; *In Re: Lifeline and Link-Up Programs*, Docket No. M-00051871, Final Order, (May 23, 2005); see also *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).

16. The Commission's regulation applicable for ETC designation and annual certification, 52 Pa. Code § 69.2501, in part provides:

(b) Petitions for designation as an ETC seeking low income support from Lifeline and Link-up America programs should satisfy the minimum standards established in 66 Pa.C.S. § 3019(f) (relating to lifeline service) 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, except that verifications should be submitted annually to Universal Service Administrative Company (USAC) on or before August 31 of each year. Petitions should affirm that the applying carrier will submit annual Lifeline Tracking Reports by June 30 of each year. The form is available on the Commission's web site at [www.puc.state.pa.us](http://www.puc.state.pa.us), Online Forms, Telecommunications.

17. CTSI confirms that it, individually or in conjunction with Frontier, will comply with the standards established in 66 Pa.C.S. § 3019(f). CTSI also affirms that it, individually or in conjunction with Frontier, will submit annual Lifeline Tracking Reports by June 30 of each year. In sum, CTSI, in conjunction with teams at Frontier who have familiarity with the Lifeline programs, shall comply with applicable requirements associated with Lifeline and Link-Up programs relative to the Incremental CBs.

18. Regarding broadband service, RDOF support will enable the extension of gigabit per second broadband Internet access services to customers within the boundaries of the Census Blocks identified on Exhibit A to the Joint Application.

19. CTSI meets applicable federal and Commonwealth requirements for designation as an ETC 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 this Commission's orders governing requirements for ETC designation in Pennsylvania.

20. Commission approval of the Joint Petition, as supplemented herein, is in the public interest because Frontier's expanded ETC status will bring greater choice and competition to the telecommunications marketplace in the census blocks listed in Exhibit A of the Joint Petition. Many rural customers demand faster broadband connections at speeds comparable to those offered in non-rural areas. Moreover, consumers in the expanded ETC area do not have access to Gigabit speed internet, which Frontier will bring to the area through its RDOF deployment. Faster speeds can also produce an incentive for economic development in those areas.

21. The voice and broadband services Frontier proposes to deploy with the funds would advance the goals of universal service. Designating CTSI as an ETC in the Incremental CBs will permit CTSI to use RDOF funding for its intended purpose in the Incremental CBs, thereby directly advancing the goals of the RDOF program and universal service. In short, expanded availability of voice service and fiber broadband through the approval of the Joint Petition as supplemented herein, will serve the public interest.

22. Given the required timeframes in the RDOF program, Frontier requests, as set forth in the Joint Petition, that the Commission approve this Petition at its first opportunity and prior to June 7, 2021.

WHEREFORE, For the reasons set forth above, Frontier respectfully requests that the Pennsylvania Public Utility Commission grant the Joint Petition as Supplemented herein and amend Frontier Petitioners' ETC designations and grant ETC designation to CTSI as aforesaid.

Respectfully submitted,

**COMMONWEALTH TELEPHONE COMPANY LLC  
D/B/A FRONTIER COMMUNICATIONS  
COMMONWEALTH TELEPHONE COMPANY;  
FRONTIER COMMUNICATIONS OF BREEZEWOOD,  
LLC; FRONTIER COMMUNICATIONS OF CANTON,  
LLC; FRONTIER COMMUNICATIONS OF  
PENNSYLVANIA, LLC; AND**

**CTSI, LLC D/B/A FRONTIER COMMUNICATIONS  
CTSI, LLC**

By 

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Frontier Communications of Canton, LLC; Frontier  
Communications of Pennsylvania, LLC; and CTSI, LLC, d/b/a  
Frontier Communications CTSI, LLC*

Date: May 11, 2021

# **EXHIBIT A**

Frontier Communications  
Incremental Census Blocks  
Exhibit A

420099605001046	420370515002000	420550116001113	420619512001007	420619512001136
420099605001085	420370515002054	420550116001114	420619512001008	420619512001137
420099605001126	420370515002055	420550116001115	420619512001009	420619512001139
420099605001145	420370515002074	420550116001119	420619512001010	420619512005058
420099605001148	420370515002094	420550116001120	420619512001012	420619512005066
420099605001154	420370515002098	420550116001121	420619512001014	420691102012069
420099605001161	420370515002103	420550116001122	420619512001015	420691102013064
420099605001201	420370515002131	420550116001124	420619512001016	420691102013067
420099605003022	420370515002149	420550116001134	420619512001021	420691102013070
420099605003033	420430248002026	420550116001139	420619512001023	420691102013072
420099605003034	420430248002042	420550116001144	420619512001025	420691102013073
420099605003043	420430248002052	420550116001147	420619512001028	420691102013074
420099605003045	420430248002072	420550116001148	420619512001031	420691102013075
420099605003064	420430248002077	420579601003005	420619512001034	420691102013079
420099605003067	420430248002084	420579601003007	420619512001036	420691102013080
420099605003068	420430248002088	420579601003018	420619512001040	420691102013081
420099605003083	420430248002090	420579601003019	420619512001041	420691102013082
420099605003084	420430248002091	420579601003020	420619512001043	420691102013083
420099605003085	420430248002095	420579601003022	420619512001045	420691102013085
420099605003087	420550116001001	420579601003023	420619512001047	420691102013087
420099605003088	420550116001002	420579601003026	420619512001048	420691102013091
420099605003089	420550116001004	420579601003035	420619512001049	420691102013093
420099605003090	420550116001005	420579601003059	420619512001052	420691102013094
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420099605003094	420550116001009	420579601003071	420619512001063	420691102013102
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420293079002019	420550116001069	420579603004067	420619512001126	421179505001018
420293079002031	420550116001076	420579603004068	420619512001127	421179505001023
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420293079002072	420550116001093	420619512001003	420619512001131	421179505001030
420293079002098	420550116001095	420619512001005	420619512001132	421179505001090
420293079002101	420550116001112	420619512001006	420619512001133	421179505001127

# **EXHIBIT B**

Frontier Communications

North Penn Telephone Company & North-Eastern Pennsylvania Telephone Company Census  
Blocks

Exhibit B

420691102013064

420691102013073

420691102013074

421179505001018

421179505001024

421179505001030

421179505001090

421179505001127

## VERIFICATION

I, Michael J. Cicchetti, Vice President, Government and External Affairs of Frontier Communications Corporation, hereby state that the facts set forth in the foregoing Supplement to Joint Petition for Expansion of Eligible Telecommunications Carrier Status to Include Additional Census Blocks are 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 the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Michael J. Cicchetti  
Vice President, Government and External Affairs

Date: May 11, 2021

## CERTIFICATE OF SERVICE

I hereby certify that I have this 11<sup>th</sup> day of May 2021, served a true and correct copy of the foregoing document upon the persons and in the manner listed below, in accordance with the requirements of 52 Pa. Code § 1.54:

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