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June 6, 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 Supplemental verified responses of Connect Everyone LLC, a wholly owned subsidiary of Starry, Inc. ("Starry") to the Set I 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

Supplemental Responses of Connect Everyone LLC, a subsidiary of Starry, Inc.
to Bureau of Consumer Services (BCS) - 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](#)

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.

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 2:

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 affordable housing. Starry believes in providing customers with the choice to pick the speed and price tier that best meets their needs. For these reasons, Lifeline subscribers will be able to choose from a variety of service tiers that are available to all consumers.

In addition to the prices listed below, all Lifeline plans will be offered with no long-term contracts, no data caps, no equipment fees, and with a strong commitment to consumer privacy. Starry also agrees to provide Lifeline service that complies with FCC minimum service standards for Lifeline service.

The Lifeline benefit will be applied as a discount to the market rate for the service plan listed below.

Plan	Speeds	Market Rate
Connect (Broadband)	30/30	\$15
Base (Broadband)	200/200	\$50
Premium (Broadband)	500/250	\$75
Gigabit (Broadband)	1000/500	\$85

Voice	N/A	\$30
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If a customer is receiving the Lifeline benefit for broadband internet access service, that customer will be able to choose the speed tier for which they would like to apply their qualifying Lifeline discount. Upon installation and activation, the customer will receive broadband internet access service for the service tier they select and for as long as they remain a customer and desire to apply their Lifeline benefit for the service. Broadband internet access service is provided without data caps and at speeds up to the advertised speed tier that the subscriber chose.

If a customer is receiving the Lifeline benefit for voice service, or voice service plus broadband internet access service, the customer will be able to choose at least one voice plan and the broadband internet access service plan of their choosing. The voice service will include a managed VoIP service that is interconnected into the public switched telephone network, providing all of the functionality of traditional telephone service. Voice customers can use their own compatible equipment, Starry may provide the equipment, or Starry may make the equipment available for purchase.

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).

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 3: Starry is founded on a customer-first approach, which includes transparency in pricing and billing. Exhibit 1 below includes a sample invoice that Starry provides to all customers - including what it will provide to Lifeline-eligible consumers - as a result of subscribing to Starry's service. Exhibit 1 also includes a mockup of a bill insert that includes eligibility, benefits, and contact information for future customers who wish to learn about Lifeline service.

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 §954.101, 54.201(d)(2), 54.401(d), 54.408. 52 Pa. Code § 69.2501.

ORIGINAL 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

SUPPLEMENTAL RESPONSE TO QUESTION 4: Starry will utilize electronic media, social media, e-mail, direct mail, and potentially outdoor advertising campaigns to market its service to locations within its service area and to ensure that potential customers are aware of the timeframe by which Starry's services will be available in their geographic area. Starry also expects that its Lifeline landing page will be available approximately six months after the FCC authorizes support for the State. Starry will adjust its go-to-market strategy depending on the specifics of the market and the types of households within it to ensure that potential subscribers are fully aware of the service and to maximize the number of subscribers who sign up. Starry will provide a mockup of marketing material for general distribution that it will use to publicize the availability of its Lifeline service, as necessary, in a supplemental response.

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 SS 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).

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 5: Starry believes in providing customers with the choice to pick the speed and price tier that best meets their needs. For these reasons, Lifeline subscribers will be able to choose from a variety of service tiers that are available to all consumers. As a result, Starry's general terms and conditions will apply to all consumers, including Lifeline subscribers. A complete list of Starry's current terms can be found on the Company's website at starry.com/legal.

Regarding backup power, Starry certifies that its network will remain functional in emergency situations, that it will have a reasonable amount of backup power, that it will be able to reroute traffic around damaged facilities, and that it can manage traffic spikes in emergency situations. Starry's 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 and dispatch 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 its system compatible with uninterruptible power supply solutions.

Starry will maintain redundancy in the network by running fiber in two directions in most cases for its GPON network and for backhaul for its fixed wireless network components, and it will deploy point-to-point wireless redundant backhaul for fixed wireless sites as necessary.

Starry will deploy a network that has 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.

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).

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 12: In accordance with 47 CFR § 9.11(b)(5)(iii)(B), Starry will notify existing subscribers and new subscribers prior the initiation of their service if E911 service will be limited or not available. Starry will use all available means to notify subscribers of emergency services upon subscribing to Starry's service. Starry primarily utilizes electronic media, social media, e-mail, direct mail, and in-person campaigns to provide details about its service to locations within its service area and to ensure that potential customers are aware of the timeframe by which Starry's services will be available in their geographic area. In the event of a unavailability of E911 service, whether as a result of planned outage or an outage caused by weather or other unplanned event, Starry will contact customers through e-mail to inform them of the unavailability. In the future, Starry may utilize some automated voice services to provide information in a timely manner in the event it is necessary.

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?

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 14: All 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 also 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. All federal, state and local taxes, assessments, surcharges, or fees, including sales taxes, use taxes, gross receipts taxes, and municipal utilities taxes, are therefore not included in the rates quoted herein. 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, which serves as the basis of Starry's Lifeline service.

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.

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 15: All 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 also 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. All federal, state and local taxes, assessments, surcharges, or fees, including sales taxes, use taxes, gross receipts taxes, and municipal utilities taxes, are therefore not included in the rates quoted herein.

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.

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 16: All Starry subscribers, including future Lifeline-eligible consumers, are billed directly at the end of each billing period for the subsequent billing period. In this way, Starry's service is a combination of pre- and post-paid; the bill is delivered and paid at the end of the previous billing period and covers the service for the next billing period. Starry's first priority is to provide an exceptional customer experience, and Starry's customers may contact the customer support team at any time.

Specifically, Starry provides customer service 24x7x365 with 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. Customers can access customer service through Starry's website, by calling a toll-free number ((888) 231-9403), and through the Starry mobile application. In addition, on some of Starry's Wi-Fi routers customers can request a customer care call directly through the device.

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.

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?

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 19: An E911 feature will be included in Starry's voice service, and calls or texts to 911 emergency services will be free of charge to subscribers. Consistent with Starry's current approach to deploying our broadband network and advertising the service, we will seek to develop partnerships with state and local organizations, including to arrange for the provision of emergency services. Starry also will further our mission to connect all consumers to affordable, reliable broadband service through our Starry Connect program in unserved and underserved public and affordable housing communities throughout the State, and will coordinate with the respective agencies to achieve this goal.

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?

ORIGINAL 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.

SUPPLEMENTAL RESPONSE TO QUESTION 23: Starry is in continued negotiations with potential third-party vendors for a full scale managed VoIP provider, which Starry will incorporate into its network and rely on for voice service within its service areas. Starry intends to offer voice service within the United States and outlying territories and will provide more information in response to this question, as necessary, once an agreement is executed.

28. Please identify the third-party VoIP vendor listed on page 3 of the Petition, and state the term of the contract with that vendor.

ORIGINAL CONFIDENTIAL RESPONSE TO QUESTION 28: Starry currently provides an over-the-top VoIP service through Ooma, and is in the process of negotiating an agreement with a full scale managed VoIP provider, which it will incorporate into its network and rely on for voice service within its RDOF territory. Starry will file a Supplemental response to this question as soon as more information is available.

SUPPLEMENTAL RESPONSE TO QUESTION 28: Starry is in continued negotiations with potential third-party vendors for a full scale managed VoIP provider, which Starry will incorporate into its network and rely on for voice service within its service areas. Starry will provide additional details, as necessary, once an agreement is executed.

EXHIBIT 1: SUPPLEMENTAL RESPONSE TO QUESTION 3

Starry - Sample Invoice – **NOT FOR DISTRIBUTION**

Starry Inc.

PO Box 52226
Boston, Massachusetts 02205
United States
+1 888-231-9403
support@starry.com

Receipt

Receipt number **2877-4081**
Invoice number **E66EDD2D-0007**
Date paid **May 25, 2021**

Paid by
jeremy+atlas@starry.com

\$0.00 paid on May 25, 2021

Description	Qty	Unit price	Amount
MAY 25 - JUN 25, 2021			
Starry Internet Testing	1	\$0.00	\$0.00
Subtotal			\$0.00
Amount paid			\$0.00

Starry - Mock-Up of Lifeline Bill Insert

Starry, Inc. Lifeline Program Offerings **SAMPLE MOCK UP - NOT FOR DISTRIBUTION**

What is Lifeline?

Lifeline is a federal government assistance program supported by the Federal Communications Commission. The Lifeline benefit will be applied as a discount to the market rate for the service plan listed below.

Plan	Speeds	Market Rate
Connect (Broadband)	30/30	\$15
Base (Broadband)	200/200	\$50
Premium (Broadband)	500/250	\$75
Gigabit (Broadband)	1000/500	\$85
Voice	N/A	\$30

Who can enroll in Starry's Lifeline program?

Customers may qualify for Lifeline Service if their household income level is at or below 135% Federal Poverty Income Guidelines for a household of that size; or if a member of the customer's household receives benefits from one of the following federal assistance programs:

- Supplemental Security Income (SSI);
- Medicaid;
- Supplemental Nutrition Assistance Program (SNAP);
- Federal Public Housing Assistance;
- Veteran's Pension or Survivor's Pension Benefit;
- Tribal Programs (and live on federally-recognized Tribal lands) including:
 - Any program listed above
 - Bureau of Indian Affairs General Assistance
 - Head Start
 - Tribal Temporary Assistance for Needy Families
 - Food Distribution Program on Indian Reservations

Lifeline service is limited to one service per qualified customer or household. A household is defined as an economic unit that consists of all adults contributing to and sharing in the income and expenses of a

household. Additionally, in order to qualify for the Lifeline benefit, an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service. Starry (or the National Verifier, state Lifeline administrator, or other state agency, if applicable) will determine whether or not an applicant meets the eligibility requirements necessary to participate in Lifeline service.

Starry is required to annually certify all Lifeline participants to ensure continued eligibility in accordance with the Lifeline regulations. If Starry has a reasonable basis to believe that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer, Starry will notify the customer and follow the appropriate procedures under the Lifeline regulations.

Lifeline customers have the responsibility to notify Starry within thirty (30) days of a change in eligibility status if they no longer qualify for Lifeline Service. Lifeline customers also must inform Starry within thirty (30) days if they move to a new address. Lifeline cannot be transferred to another person, but you can keep the Lifeline benefit if you move to another address. You must activate your service.

Lifeline is a federal benefit. Willingly making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment, or being barred from the program. Proof of eligibility is required, and only eligible customers may enroll.

What are the benefits of Starry's Lifeline program?

Effective [timeline subject to FCC authorization], the Lifeline benefit for voice service is currently \$5.25 and the Lifeline benefit for broadband service is currently \$9.25. Lifeline benefit amounts are set by the Federal Communications Commission and are subject to change.

Under Starry's Lifeline program, subscribing customers receive discounted rates for voice or broadband internet service. Starry's Lifeline offering also may include the following features:

- Basic Local Exchange;
- access to Local Calling Services;
- access interexchange calling services;
- access to toll-free telecommunications services such as 800 NPA; and access to toll-free emergency services by dialing 0 or 9-1-1 (where available);
- access to relay services for the hearing and/or speech impaired.

Starry's Lifeline service also may include the following:

- Free Caller ID
- Free Voice Mail
- Free Call Waiting
- Free Forward to Mobile
- Free Robo-Call Blocking

Standalone voice and bundled voice service include unlimited nationwide calling (US & Canada).

Where can I apply for Starry's Lifeline services?

You must meet certain eligibility requirements in order to qualify for Lifeline service. Customer inquiries

or complaints regarding service or accounting may be made in writing or by telephone to Starry through the channels listed below. Communications through phone and e-mail will result in faster responses.

- Phone: 888-231-9403
- Email: support@starry.com
- Website: <https://support.starry.com/>
- Mail:
Starry, Inc.
38 Chauncy Street
Second Floor
Boston, MA 02111
888-231-9403
support@starry.com

Who can I contact to ask questions?

Customer inquiries or complaints regarding service or accounting may be made in writing or by telephone to Starry through the channels listed below. Communications through phone and e-mail will result in faster responses.

- Phone: 888-231-9403
- Email: support@starry.com
- Website: <https://support.starry.com/>
- Mail:
Starry, Inc.
38 Chauncy Street
Second Floor
Boston, MA 02111
888-231-9403
support@starry.com

To find more information, you may also call the Universal Service Administrative Company (USAC), which administers Lifeline for the FCC by calling 888.641.8722 or by accessing their website at www.LifelineSupport.org. Also, if you have an unresolved question or complaint about Lifeline service, please contact the Pennsylvania Public Utility Commission Bureau of Consumer Services at 1-800-692-7380. All rates, terms and conditions included in this notice are subject to change. For current Lifeline information and rates, visit usac.org or <https://www.fcc.gov/general/lifeline-program-low-income-consumers/>.

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: June 4, 2021