

1
2
3
4 **BEFORE THE PUBLIC UTILITY COMMISSION**
5 **OF OREGON**
6 **UM 1896**
7

8 In the Matter of

9
10 Supplemental Application of Douglas
11 Services, Inc. d/b/a Douglas Fast Net for
12 Designation as an Eligible
13 Telecommunications Carrier and Eligible
14 Telecommunications Provider

SUPPLEMENTAL APPLICATION TO EXPAND
DESIGNATED SERVICE AREA AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER AND ELIGIBLE
TELECOMMUNICATIONS PROVIDER

14 **I. INTRODUCTION**

15 Douglas Services, Inc., d/b/a Douglas Fast Net ("DFN"), respectfully submits this
16 supplemental application to expand its designated service area as a federal and state Eligible
17 Telecommunications Carrier ("ETC") and an Eligible Telecommunications Provider ("ETP") to
18 include the Bandon, Coquille, Glendale, Myrtle Point, Reedsport, Roseburg, Sutherlin and Winston
19 wire centers. DFN also requests ETC/ETP status to provide Lifeline and OTAP services in the
20 North Bend and Coos Bay wire centers. The requested expansion of the ETC/ETP designated
21 service area is for all purposes including participating in the federal Lifeline program and the
22 Oregon Telephone Assistance Program ("OTAP"), and for receiving federal and state support.

23 **II. BACKGROUND**

24 DFN is acquiring the assets, including customer base, of Comspan Communications, Inc.
25

1 (formerly Wantel, Inc.) also know as Comspan USA (collectively "Comspan"). Comspan has study
2 area code 539005. Comspan was previously designated as an ETC/ETP for the Bandon wire center
3 (Docket No. UM 1255, Order No. 06-681), the Roseburg, Sutherlin and Winston wire centers
4 (Docket No. UM 1202, Order No. 05-856), the Coquille wire center (Docket No. UM 1321, Order
5 No. 07-574) and the Myrtle Point, Reedsport and Veneta wire centers (Docket No. UM 1364, Order
6 No. 08-157). DFN desires to assume the role of ETC/ETP now performed by Comspan.¹

7 In addition, DFN has constructed facilities in the Glendale wire center. DFN is serving
8 customers in the Glendale wire center. As a result, DFN asks to be a designated as an ETC/ETP
9 for the Glendale wire center.

10 The Commission first designated DFN as a federal ETC and ETP in 2015 in Docket No.
11 UM 1721.² That designation was largely for the purpose of receiving federal high-cost support
12 under the Rural Broadband Experiment ("RBE"). All ETCs receiving high-cost support must also
13 offer Lifeline services by federal rule and the corresponding OTAP services by state requirements.
14 DFN's designated service area for RBE funds consisted of multiple census blocks for which the
15 FCC granted DFN Rural Broadband Experiment funding.

16 On February 2, 2018, in Docket No. UM 1896, Order No. 18-040, the Commission
17 designated DFN as a state ETC to receive Oregon Universal Service Fund ("OUSF") support in six
18 wire centers: Camas Valley, Drain, Glide, Yoncalla, Sutherlin and Winston.³ In that same order,
19 the Commission also designated DFN as a federal ETC, but only for the limited purpose of offering
20 federal Lifeline services, and as an ETP for the purpose of participating in the OTAP in those same
21 six wire centers. The federal designation was limited to Lifeline-only because no federal high-cost

22 ¹ The one exception is the Veneta wire center. Comspan did not deploy facilities in Veneta. DFN
23 requests that the Veneta wire center not be included in the DFN designated service area.

24 ² *In the Matter of Application of Douglas Services, Inc. d/b/a Douglas FastNet for*
25 *Designation as an Eligible Telecommunications Carrier in the State of Oregon for the Limited*
26 *Purpose of Offering Lifeline Service to Qualified Households and Request for Waiver,*
Application for Designation as an Eligible Telecommunications Carrier and Request for
Waiver, Docket No. UM 1721 (filed Mar. 20, 2015), Order No. 15-159.

³ *In the Matter of Application of Douglas Services, Inc. d/b/a Douglas FastNet for Designation as*
an Eligible Telecommunications Carrier and Eligible Telecommunications Provider for Purposes of
Obtaining Federal and Oregon Universal Service Fund Support, Docket No. UM 1896 (filed
September 11, 2017), Order No. 18-040.

1 support funds were available in those areas at that time. Even though the Roseburg wire center is
2 surrounded by several of the wire centers for which OUSF support was requested, it was not
3 included in the request for state or federal ETC designation because no OUSF funds were available
4 for that area.

5 On October 23, 2018, also in Docket Um 1896, but by Order No. 18-417, the Commission
6 expanded DFN's designation for the entire Roseburg wire center for the purpose of offering Lifeline
7 and OTAP services.⁴

8 DFN now seeks to expand the designated service area previously granted to it so that
9 it can offer Lifeline/OTAP services and receive federal and state support throughout the
10 Bandon, Coquille, Glendale, Myrtle Point, Reedsport, Roseburg, Sutherlin and Winston
11 wire centers to the extent not already so designated. In addition, DFN seeks ETC/ETP
12 status to provide Lifeline and OTAP services in the North Bend and Coos Bay wire centers.

12 III. DFN MEETS THE REQUIREMENTS FOR ETC AND ETP DESIGNATION

13 DFN meets all of the applicable Commission requirements for federal ETC designation
14 specified in Order No. 15-382⁵ as evidenced by the previous filings submitted and approved in
15 Order No. 15-159, Order No. 18-040 and Order No. 18-417.

16 DFN will offer Lifeline/OTAP discounts to qualifying residents in the same manner as it
17 does in areas where it is already designated. DFN commits to offer and advertise Lifeline and
18 OTAP services throughout all of the wire centers for which it receives designation. DFN will
19 offer Lifeline/OTAP discounts as set out in federal and state rules.

20 The names, number of minutes, calling areas, and prices of DFN's offerings can be
21 found at <https://dfn.net/phone>. Details of DFN's broadband offerings can be found at
22 <https://dfn.net/internet>.

23 ⁴ *In the Matter of Douglas Services, Inc. dba Douglas FastNet, Supplemental Application to Expand*
24 *Designated Service Area to Offer Lifeline and OTAP Services*, Docket No. 1896 (filed September
25 21, 2018), Order No. 18-417.

26 ⁵ See Revised ETC Order, Exhibit A (setting forth a "checklist" of requirements applicable to all
ETC designations). Docket UM 1648, Order No. 15-382.

1 DFN's initial ETC/ETP application in this docket also demonstrates that it meets Oregon
2 requirements for ETP designation. DFN is currently participating in the OTAP and confirms its
3 commitment to follow all applicable OTAP and RSPF requirements.

4 DFN commits to comply with all applicable federal and Oregon regulations and reporting
5 requirements for ETC and ETP designation.

6 **IV. GRANTING THE REQUEST IS IN THE PUBLIC INTEREST**

7 Granting DFN's request to expand its designated service area is in the public interest.
8 DFN will provide service in the areas previously served by Comspan. In addition, DFN
9 requests designation in the Glendale wire center. Designating DFN as an ETC/ETP will not
10 put an undue burden on either the federal or the state fund since Comspan is already so
11 designated. DFN is simply taking Comspan's place.

12 A map showing the designated service area is attached as Exhibit A.

13 **V. CONCLUSION**

14 For the reasons explained above, DFN respectfully requests that the Commission grant
15 its application to expand its designation as a federal and state ETC and ETP for the purposes set
16 out herein.

17 Dated this 23rd day of July, 2020.

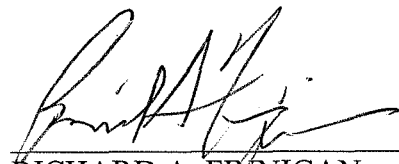
18 
19 _____
20 RICHARD A. FINNIGAN,
21 Attorney for Douglas Services, Inc.
22 d/b/a Douglas Fast Net



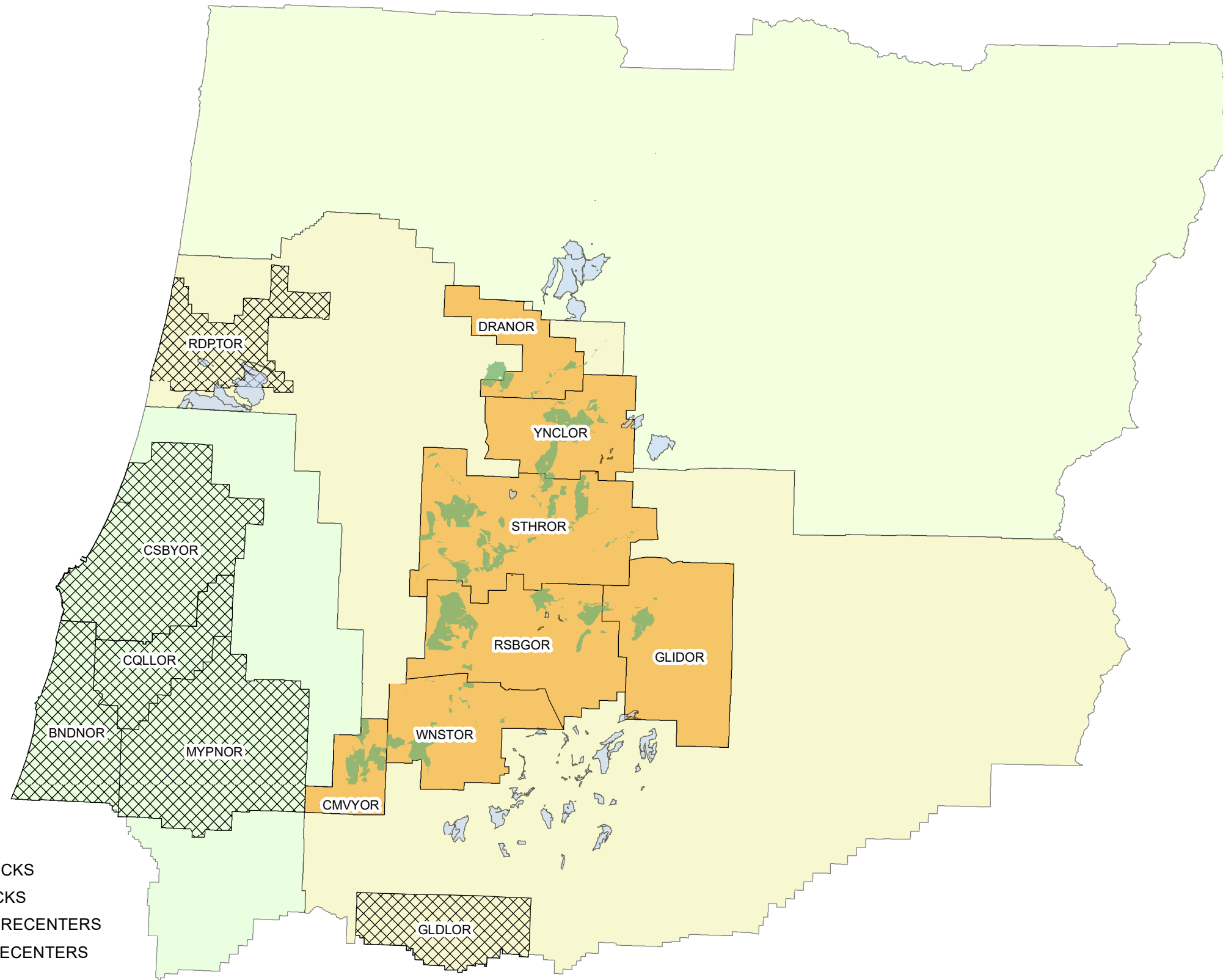
EXHIBIT A










DOUGLAS SERVICES INC.
2350 NW AVIATION DR
ROSEBURG, OR 97470
541-673-4242

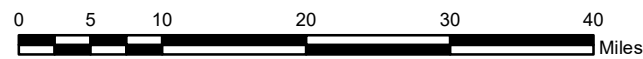
SITE: (SITE NAME)
PROPOSED LOCATION:
(ADDRESS)
(LAT/LON)

COMMENTS:



LEGEND

-  DFN CAFII BLOCKS
-  DFN RBE BLOCKS
-  PROPOSED WIRECENTERS
-  CURRENT WIRECENTERS
-  LANE COUNTY
-  DOUGLAS COUNTY
-  COOS COUNTY



SHEET:
EXHIBIT A

DESIGNED BY: RICK BRAMMER
DATE: 6/29/2020
VERSION: PRELIMINARY
APPROVED BY: