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March 23, 2023

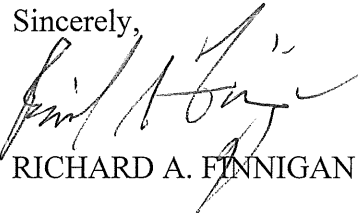
VIA E-MAIL

Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: Douglas Services, Inc. d/b/a Douglas Fast Net – Application to Expand Designated
Service Area As An Eligible Telecommunications Carrier and Eligible
Telecommunications Provider

Dear Sir/Madam:

Attached for filing you will find the Application to Expand Designated Service Area As
An Eligible Telecommunications Carrier and Eligible Telecommunications Provider
and accompanying Exhibit for Douglas Services, Inc. d/b/a Douglas Fast Net.

Sincerely,

RICHARD A. FINNIGAN

RAF/cs
Enclosures

cc: Client (via e-mail)

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3
4 BEFORE THE PUBLIC UTILITY COMMISSION
5 OF OREGON
6

7 In the Matter of

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

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

13
14 **I. INTRODUCTION**

15 Douglas Services, Inc., d/b/a Douglas Fast Net ("DFN"), respectfully submits this
16 application to expand its designated service area as a federal and state Eligible Telecommunications
17 Carrier ("ETC") and an Eligible Telecommunications Provider ("ETP") to receive Oregon
18 Universal Service Fund ("OUSF") support and provide, Lifeline and OTAP services in the Culp
19 Creek, Cottage Grove, Lowell, Veneta, Creswell, Lakeside, Azalea, Myrtle Creek, Riddle,
20 Canyonville and Days Creek wire centers. DFN also requests ETC/ETP status to provide Lifeline
21 services to the Empire, Eugene 10th, Junction City, River Road and Springfield wire centers. The
22 requested expansion of the ETC/ETP designated service area is for all purposes including
23 participating in the federal Lifeline program and the Oregon Telephone Assistance Program
24 ("OTAP"), and for receiving federal and state support as identified above.

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II. BACKGROUND

The Commission first designated DFN as a federal ETC and ETP in 2015 in Docket No. UM 1721.¹ That designation was largely for the purpose of receiving federal high-cost support under the Rural Broadband Experiment (“RBE”). All ETCs receiving high-cost support must also offer Lifeline services by federal rule and the corresponding OTAP services by state requirements. DFN's designated service area for RBE funds consisted of multiple census blocks for which the FCC granted DFN Rural Broadband Experiment funding.

On February 2, 2018, in Docket No. UM 1896, Order No. 18-040, the Commission designated DFN as a state ETC to receive Oregon Universal Service Fund (“OUSF”) support in six wire centers: Camas Valley, Drain, Glide, Yoncalla, Sutherlin and Winston.² In that same order, the Commission also designated DFN as a federal ETC, but only for the limited purpose of offering federal Lifeline services, and as an ETP for the purpose of participating in the OTAP in those same six wire centers. The federal designation was limited to Lifeline-only because no federal high-cost support funds were available in those areas at that time. Even though the Roseburg wire center is surrounded by several of the wire centers for which OUSF support was requested, it was not included in the request for state or federal ETC designation because no OUSF funds were available for that area.

¹ *In the Matter of Application of Douglas Services, Inc. d/b/a Douglas FastNet for Designation as an Eligible Telecommunications Carrier in the State of Oregon for the Limited 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.

² *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 On October 23, 2018, also in Docket Um 1896, but by Order No. 18-417, the Commission
2 expanded DFN's designation for the entire Roseburg wire center for the purpose of offering Lifeline
3 and OTAP services.³

4 On February 4, 2019, the Commission granted the Application of DFN for designation as an
5 ETC and ETP for certain census blocks which were awarded through the FCC's Connect America
6 Fund Phase II ("CAF II") Auction, also known as Auction 903.⁴

7 Recently DFN sought designation as a state ETC and ETP for various wire centers as a
8 result of its acquisition of the assets of Comspan. The Commission granted the application.⁵

9 DFN now seeks to expand the designated service area previously granted to it so that it can
10 offer Lifeline/OTAP services and receive federal and state support throughout the Culp Creek,
11 Cottage Grove, Lowell, Veneta, Creswell, Lakeside, Azalea, Myrtle Creek, Riddle, Canyonville
12 and Days Creek wire centers to the extent not already so designated. In addition, DFN seeks
13 ETC/ETP status to provide Lifeline services in the Empire, Eugene 10th, Junction City, River Road
14 and Springfield wire centers.

15 **III. DFN MEETS THE REQUIREMENTS FOR ETC AND ETP DESIGNATION**

16 DFN meets all of the applicable Commission requirements for federal ETC designation
17 specified in Order No. 15-382⁶ as evidenced by the previous filings submitted and approved in
18 Order No. 15-159, Order No. 18-040, Order No. 18-417, Order 19-040 and Order 20-395.

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

23 ³ *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.

⁴ See Commission Docket UM 1969, Order No. 19-040.

⁵ Docket No. UM 1896, Order No. 20-395 dated October 6, 2020.

⁶ 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 The names, number of minutes, calling areas, and prices of DFN's offerings can be
2 found at <https://dfn.net/phone>. Details of DFN's broadband offerings can be found at
3 <https://dfn.net/internet>.

4 DFN is currently participating in the OTAP and confirms its commitment to follow all
5 applicable OTAP and RSPF requirements.

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

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

9 Granting DFN's request to expand its designated service area is in the public interest.
10 Designating DFN as an ETC/ETP will not put an undue burden on either the federal or the
11 state fund.

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 March, 2023.

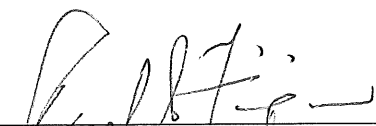
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20 _____
21 RICHARD A. FINNIGAN,
22 Attorney for Douglas Services, Inc.
23 d/b/a Douglas Fast Net
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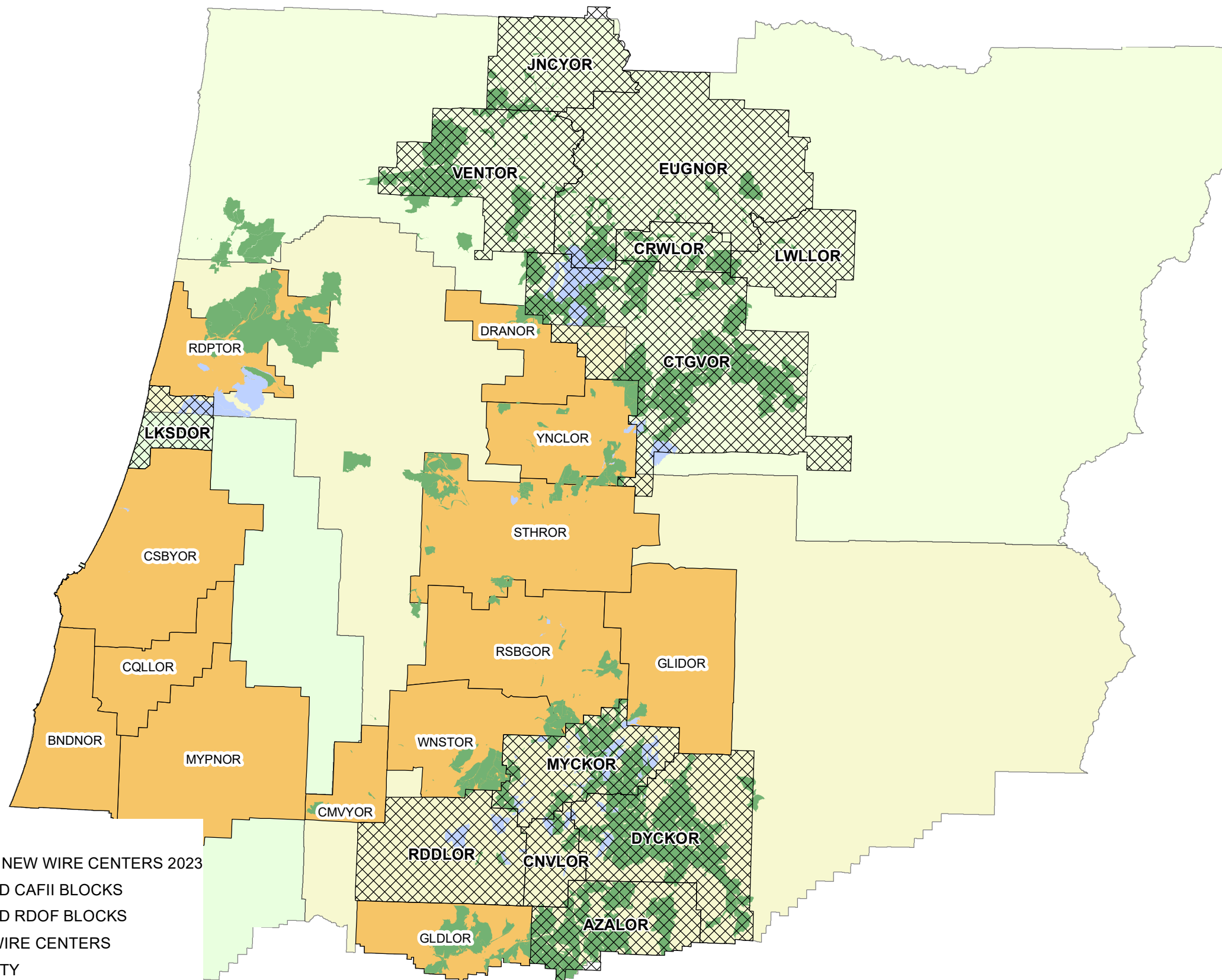
EXHIBIT A










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

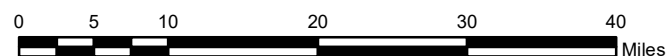
SITE: (SITE NAME)
PROPOSED LOCATION:
(ADDRESS)
(LAT/LON)

COMMENTS:



LEGEND

-  PROPOSED NEW WIRE CENTERS 2023
-  DFN FUNDED CAFII BLOCKS
-  DFN FUNDED RDOF BLOCKS
-  CURRENT WIRE CENTERS
-  LANE COUNTY
-  DOUGLAS COUNTY
-  COOS COUNTY



SHEET:
EXHIBIT A

DESIGNED BY: RICK BRAMMER
DATE: 3/22/2023
VERSION: 1
APPROVED BY: