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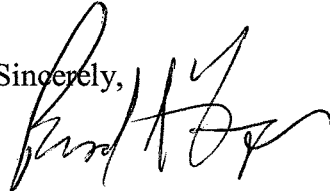
September 21, 2018

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

Re: UM 1896 - Douglas Services, Inc. d/b/a Douglas Fast Net - Supplemental
Application to Expand Designated Service Area to Offer Lifeline and OTAP
Services

Dear Sir/Madam:

Enclosed for filing you will find the Supplemental Application to Expand Designated
Service Area to Offer Lifeline and OTAP Services for Douglas Services, Inc. d/b/a Douglas Fast
Net in the above referenced Docket.

Sincerely,


RICHARD A. FINNIGAN

RAF/cs
Enclosures

cc: Client (via e-mail)
Kay Marinos (via e-mail)
Stephen Hayes (via e-mail)

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

8 In the Matter of

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

SUPPLEMENTAL APPLICATION TO EXPAND
DESIGNATED SERVICE AREA TO OFFER
LIFELINE AND OTAP SERVICES

13
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 Eligible
17 Telecommunications Carrier ("ETC") and an Eligible Telecommunications Provider ("ETP") to
18 include the remaining portions of the Roseburg wire center. The requested expansion of the
19 ETC/ETP designated service area is only for the limited purpose of participating in the federal
20 Lifeline program and the Oregon Telephone Assistance Program ("OTAP"), not for receiving
21 federal or state high-cost support. Participation will enable DFN to offer Lifeline/OTAP discounts
throughout the Roseburg wire center.

22 The Commission first designated DFN as a federal ETC and ETP in 2015 in Docket No.
23 UM 1721.¹ That designation was largely for the purpose of receiving federal high-cost support

24
25 ¹ *In the Matter of Application of Douglas Services, Inc. d/b/a Douglas FastNet for*
26 *Designation as an Eligible Telecommunications Carrier in the State of Oregon for the Limited*
SUPPLEMENTAL APPLICATION - 1

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1 under the Rural Broadband Experiment (“RBE”). All ETCs receiving high-cost support must also
2 offer Lifeline services by federal rule and the corresponding OTAP services by state requirements.
3 DFN's designated service area for RBE funds consisted of multiple census blocks for which the
4 FCC granted DFN Rural Broadband Experiment funding. Some of those census blocks are in the
5 Roseburg wire center, so DFN has already received authorization to offer Lifeline/OTAP services in
6 those specific census blocks. However, DFN is currently not authorized to offer Lifeline/OTAP
7 services in the remaining portion of the Roseburg wire center.

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

18 DFN now seeks to expand the designated service area granted in Order No. 18-040 so
19 that it can offer Lifeline/OTAP services throughout the Roseburg wire center. Such
20 designation is limited to federal ETC status only for the purpose of offering federal
21 Lifeline, and ETP status to offer OTAP services. DFN does not seek designation as a state
22 ETC to receive OUSF support, nor as a federal ETC for high-cost support for the Roseburg
23 wire center. Because some census blocks are already in the designated service area for
24 federal RBE high-cost support and Lifeline/OTAP support, those census blocks are
25 excluded from this supplemental request.

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.

² See Commission Docket UM 1896, Order No. 18-040.

SUPPLEMENTAL APPLICATION - 2

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1 **II. DFN MEETS THE REQUIREMENTS FOR ETC AND ETP**
2 **DESIGNATION**

3 DFN meets all of the applicable Commission requirements for federal ETC designation
4 specified in Order No. 15-382³ as evidenced by the previous filing submitted in this docket and
5 approved in Order No. 18-040. Several points that specifically pertain to the Lifeline/OTAP
6 service offerings proposed for the Roseburg wire center are addressed as follows.

7 DFN will offer Lifeline/OTAP discounts to qualifying Roseburg residents in the same
8 manner as it does in areas where it is already designated. DFN commits to offer and advertise
9 Lifeline and OTAP services throughout the wire center area. DFN will offer Lifeline/OTAP
10 discounts on its voice-only basic telephone service offering⁴ that will not exceed \$34.99 per
11 month. Customers qualifying for Lifeline will also be permitted to apply the Lifeline discount
12 to DFN's bundled service plans that include voice and broadband. The names, number of
13 minutes, calling areas, and prices of DFN's offerings can be found at <https://dfn.net/phone>.
14 Details of DFN's broadband offerings can be found at <https://dfn.net/internet>.

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

18 DFN commits to comply with all applicable federal and Oregon regulations and reporting
19 requirements for ETC and ETP designation in the Roseburg wire center.

20 **III. GRANTING THE REQUEST IS IN THE PUBLIC INTEREST**

21 Granting DFN's request to expand its designated service area to include the Roseburg
22 wire center is in the public interest. DFN has customers in the Roseburg area who qualify
23 for Lifeline/OTAP discounts but are not currently able to receive them from DFN. At
24 present, DFN can only offer Lifeline/OTAP to customers residing in the few census blocks

25 ³ See Revised ETC Order, Exhibit A (setting forth "checklist" of requirements applicable to all
26 ETC designations). Docket UM 1648, Order No. 15-382.

⁴ DFN's offering meets the definition of basic telephone service set forth in OAR 860-032-0910.
SUPPLEMENTAL APPLICATION - 3

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1 in the Roseburg wire center for which it received RBE funding and was designated in Order
2 No. 15-159. Those census blocks are shown on the map in Exhibit A, along with the wire
3 centers for which DFN received designation in Order No 18-040. Granting DFN's request
4 will enable Roseburg residents to have increased choices for Lifeline services and providers.
5 It will also assist in easing the administration of Lifeline services for both DFN and OTAP
6 personnel because it will fill in gaps that currently exist within the Roseburg wire center and
7 among the surrounding wire centers.

8 IV. CONCLUSION

9 For the reasons explained above, DFN respectfully requests that the Commission grant
10 its application to expand its designation as a federal ETC and ETP for the limited purpose of
11 offering Lifeline and OTAP services to include the areas within the Roseburg wire center where
12 DFN has not previously been designated as a federal Lifeline ETC and as an ETP.

13 Dated this 21st day of September, 2018.

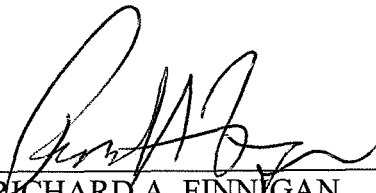
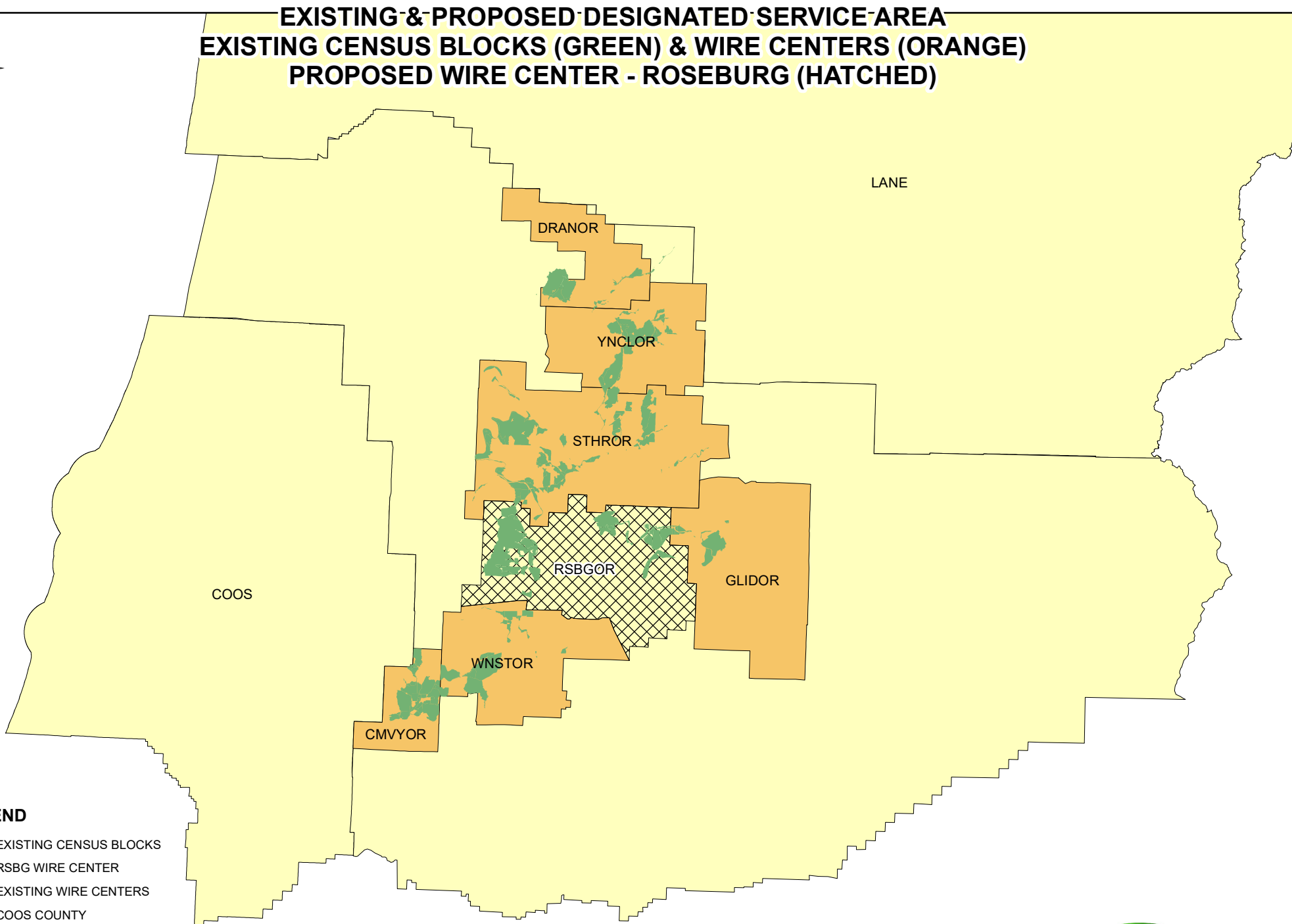
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15 
16 RICHARD A. FINNIGAN,
17 Attorney for Douglas Services, Inc.
18 d/b/a Douglas Fast Net

EXHIBIT A







(Map)

EXHIBIT A

EXISTING & PROPOSED DESIGNATED SERVICE AREA EXISTING CENSUS BLOCKS (GREEN) & WIRE CENTERS (ORANGE) PROPOSED WIRE CENTER - ROSEBURG (HATCHED)



LEGEND

-  EXISTING CENSUS BLOCKS
-  RSBG WIRE CENTER
-  EXISTING WIRE CENTERS
-  COOS COUNTY
-  DOUGLAS COUNTY
-  LANE COUNTY

