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December 15, 2020

VIA E-MAIL

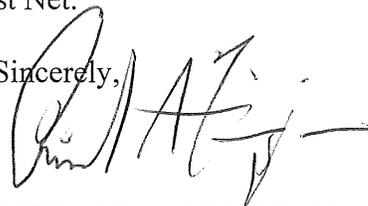
Public Utility Commission of Oregon  
PO Box 1088  
Salem, OR 97308-1088

Re: Douglas Services, Inc. d/b/a Douglas Fast Net – Application for Designation As An Eligible Telecommunications Carrier and Eligible Telecommunications Provider

Dear Sir/Madam:

Attached for filing you will find the Application for Designation As An Eligible Telecommunications Carrier and Eligible Telecommunications Provider and accompanying Exhibits for Douglas Services, Inc. d/b/a Douglas Fast Net.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs  
Enclosures

cc: Client (via e-mail)

1  
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3  
4 BEFORE THE PUBLIC UTILITY COMMISSION  
5 OF OREGON  
6  
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

APPLICATION FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS  
CARRIER AND ELIGIBLE  
TELECOMMUNICATIONS PROVIDER

13  
14 **I. INTRODUCTION**

15 Douglas Services, Inc., d/b/a Douglas Fast Net ("DFN"), pursuant to section 214(e)(1)-  
16 (2) of the federal Communications Act of 1934, as amended (the "Act"), and section 54.201 of  
17 the Federal Communication Commission ("FCC") rules, and the requirements of the  
18 Commission,<sup>1</sup> respectfully submits this application for designation as an Eligible  
19 Telecommunications Carrier ("ETC") to receive federal high-cost and Lifeline support  
20 throughout the census blocks identified in Exhibit A, which comprise portions of Douglas and

21 <sup>1</sup> See *In the Matter of Public Utility Commission of Oregon Staff Investigation to Establish*  
22 *Requirements for Initial Designation and Recertification of Telecommunications Carriers*  
23 *Eligible to Receive Federal Universal Service Support*, Docket UM 1217, Order No. 06-292  
24 (entered June 13, 2006) ("ETC Order"); *In the Matter of Public Utility Commission of Oregon*  
25 *Staff Investigation into Eligible Communication Carriers' Requirements*, Docket UM 1648,  
Order No. 15-382 (entered Dec. 1, 2015) ("Revised ETC Order"); and OAR Chapter 860,  
Division 033; Residential Service Protection Fund (the "RSPF Rules").

26 APPLICATION FOR DESIGNATION AS AN  
ETC AND ETP - 1

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1 Lane counties. Section 214(e)(2) of the Communications Act of 1934, as amended, places the  
2 authority for ETC designation with state commissions. Under sections 214(e)(1) and 254, the  
3 Commission has the authority to designate DFN as an ETC for federal universal service fund  
4 (“FUSF”) support.

5 In addition, DFN seeks designation as an Eligible Telecommunications Provider (“ETP”) in  
6 the same census blocks.

7 DFN was first designated as a competitive local exchange carrier (“CLEC”) in Oregon in  
8 2001,<sup>2</sup> and the Commission granted DFN additional authority as a competitive provider in  
9 2009.<sup>3</sup>

10 On May 19, 2015, the Commission designated DFN as a federal ETC for the purposes of  
11 receiving Rural Broadband Experiment and federal Lifeline universal service funds, and as an  
12 ETP to participate in the Oregon Telephone Assistance Program (“OTAP”).<sup>4</sup> The designated  
13 service area in that case was defined by the census blocks for which the FCC granted DFN Rural  
14 Broadband Experiment funding in 2015.

15 On February 2, 2018, the Commission granted the Application of DFN for designation as a  
16 state ETC (for purposes of receiving OUSF support), as a federal ETC (only for Lifeline purposes)  
17 and as an ETP (to participate in the OTAP) in six wire centers: Camas Valley, Drain, Glide,  
18 Yoncalla, Sutherlin and Winston.<sup>5</sup>

19 On February 4, 2019, the Commission granted the Application of DFN for designation as an  
20 ETC and ETP for certain census blocks which were awarded through the FCC’s Connect America  
21 Fund Phase II (“CAF II”) Auction, also known as Auction 903.<sup>6</sup>

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22 <sup>2</sup> See Commission Docket CP 962, Order No. 01-902.

23 <sup>3</sup> See Commission Docket CP 1457, Order No. 09-322.

24 <sup>4</sup> *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.*

<sup>5</sup> See Commission Docket UM 1896, Order No. 18-040.

<sup>6</sup> See Commission Docket UM 1969, Order No. 19-040.

1 Recently DFN sought designation as a state ETC and ETP for various wire centers as a  
2 result of its acquisition of the assets of Comspan. The Commission granted the application.<sup>7</sup>

3 DFN now seeks federal ETC and state ETP designation to receive federal funds awarded  
4 through the recently completed Rural Digital Opportunity Fund (RDOF) auction, also known as  
5 Auction 904.

6 The list of census blocks for which DFN now seeks ETC and ETP designation is attached  
7 hereto as Exhibit A.

8 DFN is not seeking to expand either of its current designated service areas through this  
9 filing, but rather seeks to establish a separate designated service area from those established in  
10 Dockets UM 1721 and UM 1896. This is necessitated by the differing nature of the RDOF funds  
11 and the associated obligations. It is likely that the USF administrator will assign a separate Study  
12 Area Code (SAC) to this area for the same reasons.

13 The FCC addressed ETC designation obligations of auction winners in an Order adopted  
14 January 30, 2020.<sup>8</sup> In paragraph 81 of the Order, the FCC states that it expects winning bidders to  
15 submit their petition for ETC designations to the appropriate authority within 30 days of the  
16 Commission's announcement of the winning bids. The FCC announced the winning bids on  
17 December 7, 2020, in Public Notice DA 20-1422.<sup>9</sup> Certification of obtaining ETC status must be  
18 provided within 180 days of the announcement.<sup>10</sup>

19 As detailed below, DFN meets all the requirements for federal ETC and ETP  
20 designation. First, DFN meets all of the Commission's requirements for ETC designation as  
21 revised by the Commission in 2015.<sup>11</sup> As detailed in Section II, DFN satisfies each requirement  
22 in the Commission's revised "checklist" set forth in Appendix A to Order No. 15-382 in Docket  
23 UM 1648, which apply to "any carrier requesting designation as an ETC in Oregon."

24 <sup>7</sup> Docket No. UM 1896, Order No. 20-395 dated October 6, 2020.

25 <sup>8</sup> Rural Digital Opportunity Fund Report and Order, FCC 20-5 (Released February 7, 2020).

26 <sup>9</sup> DFN was part of the Rural Electric Cooperative Consortium listed on Attachment A to DA 20-1422

<sup>10</sup> Rural Digital Opportunity Fund Report and Order. Also FCC DA 20-1422.

<sup>11</sup> See Revised ETC Order, Exhibit A (setting forth a "checklist" of requirements applicable to all ETC designations).

1 In addition, as explained in Section III below, DFN meets all the requirements for ETP  
2 designation.

3 **II. DFN MEETS ALL THE REQUIREMENTS FOR ETC DESIGNATION**

4 **1. Information regarding applicant and its common carrier status**

5 In satisfaction of checklist item 1.1, the entity requesting designation is Douglas  
6 Services, Inc., d/b/a Douglas FastNet, a subsidiary of Douglas Electric Cooperative, Inc. In  
7 satisfaction of checklist item 1.2, DFN is a common carrier. Specifically, DFN is a CLEC in  
8 Oregon, initially authorized by the Commission under Docket CP 962, Order No. 01-902, and  
9 subsequently under Docket CP 1452, Order No. 09-322. With respect to item 1.3, DFN provides  
10 voice and broadband service across Douglas County and portions of Lane County and Coos  
11 County, as relevant to this Application.

12 In satisfaction of item 1.4, DFN has the financial and technical capability to provide the  
13 supported services in compliance with FCC and Commission rules. DFN has been in  
14 business since 2001, has over 2000 voice customers and over 6000 broadband customers.  
15 Accordingly, DFN does not intend to rely exclusively on USF disbursements to operate,  
16 and generates significant revenue from the current services it provides to voice and  
17 broadband customers, including non-Lifeline customers. Finally, DFN has not been subject  
18 to any enforcement action or ETC revocation proceedings in any other jurisdiction.

19 **2. Type of federal universal service support for which designation is requested**

20 Per checklist item 2.1, DFN seeks eligibility for federal high-cost RDOF and Lifeline  
21 support. As noted above, DFN does have a pending federal USF support award that is  
22 conditional upon the ETC designation sought herein.

23 **3. Commitment and ability to provide all supported services**

24 Checklist item 3.1 requires a statement of commitment to offer supported voice  
25 telephony services. Section 54.101 of the FCC rules requires an ETC eligible to receive high-  
26 cost support to offer to provide voice telephony services.<sup>12</sup> Eligible voice telephony services

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25 <sup>12</sup> 47 C.F.R. § 54.101(b) and (a)(1).  
26 APPLICATION FOR DESIGNATION AS AN  
ETC AND ETP - 4

1 must provide (1) voice grade access to the public switched network or its functional  
2 equivalent, (2) minutes of local usage provided at no additional charge to end users, (3)  
3 access to emergency services including 911, where implemented, and (4) toll limitation for  
4 qualifying low-income customers. DFN offers, and commits that it will continue to offer, all  
5 of the foregoing services. In particular, DFN will offer a standalone voice offering that meets  
6 the definition of "basic telephone service" set forth in OAR 860-032-0190, including local  
7 exchange calling and access to EAS, long-distance, relay service for the hearing and speech  
8 impaired, operator services, directory assistance, and 911. Accordingly, with respect to item  
3.2, DFN currently offers the required voice telephony services.

9 Item 3.3 requires an ETC applicant to identify and describe its local voice telephony  
10 service offerings within the designated service area. The names, number of minutes, calling  
11 areas, and prices of DFN's offerings can be found at <https://dfn.net/phone>. Item 3.4 requires a  
12 description of broadband services to be offered, if such services must be provided as a  
13 condition for receiving USF support. Details of DFN's broadband offerings can be found at  
<https://dfn.net/internet>.

#### 14 **4. Identification and definition of proposed designated service area**

15 DFN's requested ETC service area in Oregon consists of certain census blocks in Douglas  
16 and Lane counties listed on Exhibit A. DFN will offer supported services to any potential  
17 customer in this proposed designated service area. In satisfaction of item 4.1.1, a map of the  
18 census blocks comprising the proposed designated service area is attached as Exhibit B. For  
19 convenience, the map also indicates boundaries of the ILEC wire centers in the area, although the  
20 wire centers are not to be used to define the designated service area. As to requirement 4.1.2, DFN's  
21 rationale for defining the designated service area by census blocks is that federal support in RDOF  
22 process is based on census block locations. Using census blocks as the basis for the geographic area  
23 for DFN's additional ETC designation is consistent with the approach the Commission has taken in  
24 the past.<sup>13</sup> As to requirement 4.1.3, please see Exhibit A.

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25 <sup>13</sup> Docket UM 1721, Order No. 15-159.  
26 APPLICATION FOR DESIGNATION AS AN  
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1 As to requirement 4.2, DFN will provide the supported services through the proposed  
2 service area. Indeed, as set out in II.6, below, it is required to do so.

3 **5. Types of facilities used to offer supported services**

4 Checklist item 5.1 requires a description of types of network facilities currently used to  
5 provide service. DFN uses state-of-the-art fiber networks to serve customers, and plans to  
6 continue to use and expand this network to serve customers throughout the proposed designated  
7 service area. DFN plans to provide such customers with Fiber-to-the-Home or Fiber-to-the-  
8 Node service based on technical feasibility and proximity to DFN's fiber network.

9 DFN's commitment is to provide gigabyte Internet connection in the RDOF  
10 areas. With respect to application item 5.2, DFN expects to serve customers using its own  
11 facilities.

12 DFN's network deployment is confidential. To the extent that checklist item 5.3 is  
13 applicable, DFN is willing to share that information upon request.

14 Checklist item 5.4 requires identification of service providers with which applicant has  
15 current and relevant resale or interconnection agreements. In satisfaction of this requirement,  
16 DFN identifies the following carriers with whom it has current interconnection agreements that  
17 are relevant to the areas in which it now seeks ETC designation:

18 Qwest Corporation d/b/a CenturyLink  
19 CenturyTel of Eastern Oregon, Inc. d/b/a CenturyLink  
20 CenturyTel of Oregon, Inc. d/b/a CenturyLink  
21 Citizens Telecommunications Company of Oregon  
22 Frontier Communications Northwest, Inc.

23 The CenturyLink companies are now known as Lumen. Citizens and Frontier are now  
24 known as Ziplly Communications.

25 **6. Commitment to use support funds in accordance with FCC and Commission  
26 rules**

27 In satisfaction of item 6.1, DFN hereby states its commitment to use support funds in  
28 accordance with FCC and Commission rules, as reflected in the attached Affidavit of Todd Way,

1 a corporate officer of DFN. Per item 6.2, DFN also certifies that it will comply with the  
2 service requirements applicable to the support it receives, including without limitation, the  
3 Commission's rules and orders governing ETCs and ETPs, and the applicable provisions of the  
4 FCC rules, 47 C.F.R. § 54.101, et seq., including all applicable limitations on use of funds and  
5 reporting requirements. DFN specifically commits to comply with all rules for offering  
6 Lifeline and OTAP services, including FCC-required disclosures to consumers concerning  
7 Lifeline service offering in Lifeline marketing materials, and further commits to adhere to the  
8 advertising, marketing, and disclosure rules set forth in OAR 860-033-0110.

9 Requirement 6.3 is a five-year plan that describes with specificity proposed  
10 improvements or upgrades to applicant's network throughout its proposed service area, including  
11 estimates of the area and population that will be served as a result of the improvements. The  
12 RDOF application provides such information for the RDOF locations. There are milestones that  
13 must be met. See FCC 20-5 for more information.

14 **7. Commitment to advertise high-cost (non-Lifeline) supported**  
15 **services throughout the service area**

16 In satisfaction of item 7.1, DFN affirms its commitment to advertise supported services  
17 throughout the service area. DFN's business depends on revenues from its voice and broadband  
18 plans to customers. It has no intention to cease advertising those services. With respect to item  
19 7.2, a brief description of advertising plans for supported services, DFN will publicize the  
20 availability of its non-Lifeline service offerings in a manner designed to facilitate consumer  
21 awareness of DFN's competitive offerings and attract new customers to DFN. This effort will  
22 include advertising through media of general distribution, and Internet advertising.

23 **8. Commitment to offer and advertise Lifeline and OTAP services**

24 In satisfaction of checklist item 8.1, DFN commits to offer and advertise Lifeline and  
25 OTAP services throughout the designated service area. In satisfaction of requirement 8.2, the  
26 identification and description of specific service offerings that applicant will provide to  
27 qualifying Lifeline and OTAP customers, DFN notes that it will continue to offer the Lifeline

1 discounts on its voice-only basic telephone service offering <sup>14</sup> that will not exceed \$34.99 per  
2 month. Customers qualifying for Lifeline will also be permitted to apply the Lifeline  
3 discount to DFN's bundled service plans that include voice and broadband. Because DFN  
4 does not plan to offer any Lifeline services at no charge to the customer, neither requirement  
5 8.2.1 nor requirement 8.2.2 applies to DFN.

6 Checklist requirement 8.3 asks for a description of advertising plans designed to reach  
7 the target low-income population that applicant will implement after designation. DFN  
8 therefore reaffirms its commitment to advertise the availability of its Lifeline and OTAP service  
9 offerings throughout its designated service area in a manner reasonably designed to reach those  
10 likely to qualify for the service. Consistent with FCC rules, DFN will advertise the availability  
11 of its Lifeline offerings via media of general distribution (e.g., newspaper, magazine, or radio  
12 advertisements as well as direct mailings, bill inserts, or public displays). <sup>15</sup> DFN will continue to  
13 utilize FCC outreach guidelines for advertising Lifeline service offering, including use of  
14 outreach materials and methods designed to reach households that currently do not have  
15 telephone service, development of advertising material for non-English speaking populations  
16 within its service area, and coordination of outreach efforts with relevant government agencies.  
17 DFN also reaffirms its commitment to work with relevant state agencies, community outreach  
18 organizations, and non-profit organizations to make information available regarding DFN's  
19 Lifeline and OTAP service offerings in resource guides and other printed material produced by  
20 those organizations, as well as in their offices or other locations visited by potential Lifeline-  
21 eligible subscribers. DFN will build on its existing relationships with these organizations in  
22 Douglas County and will look for opportunities to forge stronger relationships with similar  
23 organizations in Lane County.

24 In accordance with item 8.4 in Exhibit A to Order 15-382, DFN hereby requests  
25 designation as an Eligible Telecommunications Provider to allow it to participate in the OTAP  
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<sup>14</sup> DFN's offering meets the definition of basic telephone service set forth in OAR 860-032-0910.

<sup>15</sup> 47 C.F.R. § 54.201(d)(2).

1 program throughout the expanded designated ETC service area proposed herein. Consistent with  
2 item 8.4 and the foregoing request, DFN commits itself to follow all applicable OTAP and  
3 RSPF requirements, including OAR Chapter 860-033 sections 0010, 0030, 0035, 0045, 0046,  
4 0100 and 0110.<sup>16</sup>

5 Checklist item 8.5 is documentation showing the applicant's policies and procedures  
6 related to the training of third-party representatives and employees on Lifeline and/or OTAP  
7 requirements, as well as documentation showing internal quality control measures for actual  
8 applications received by the applicant. With respect to this requirement, DFN notes that it will  
9 not utilize third-party representatives to market Lifeline/OTAP plans. There is very low risk of  
10 any waste, fraud, or abuse with respect to DFN's Lifeline plans. DFN applies the Lifeline  
11 discount to existing service plans, to which customers contribute the remaining monthly fees,  
12 eliminating the need to train DFN employees on distinct Lifeline plans. DFN will utilize its  
13 regular employee training to ensure that its employees are trained on the availability of Lifeline  
14 discounts.

15 Finally, in accordance with checklist item 8.6, after the ETC designation requested herein  
16 is granted by the Commission, DFN will file all necessary information with the FCC's  
17 designated administrator, the Universal Service Administrative Corporation, to fulfill any and all  
18 requirements under 47 C.F.R. § 54.401(d).

### 19 **9. Ability to remain functional in emergency situations**

20 Checklist item 9.1 requires that an ETC demonstrate its ability to retain functionality in  
21 an emergency situation.<sup>17</sup> Per item 9.1.1, 9.1.2., and 9.1.3, respectively, that demonstration  
22 must specifically address the amount of back-up power available to the ETC, the ETC's ability  
23 to reroute traffic around damaged facilities, and the ETC's ability to manage traffic spikes  
24 resulting from emergency situations.<sup>18</sup> DFN has sufficient back-up power to ensure functionality  
25 without an external power source. In addition, DFN has sufficient excess capacity and/or

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26 <sup>16</sup> DFN is aware the OPUC is in the process of updating and adding to Division 033 in AR 635.  
DFN commits to comply with all changes the Commission may adopt.

<sup>17</sup> 47 C.F.R § 54.202(a)(2).

<sup>18</sup> *Id.*

1 redundancy in its network that it can re-route traffic around damaged facilities. DFN is also  
2 able to manage traffic spikes resulting from emergency situations.

3 As to item 9.2, E911 is deployed and fully functional. For requirement 9.3, DFN  
4 commits to comply with Oregon's 9-1-1 emergency reporting system tax requirements.

5 **10. Commitment to meet service quality and consumer protection standards**

6 Per checklist item 10.1, DFN is committed to specific, objective measures for service  
7 quality and consumer protection, including adherence to Commission rules for wireline carriers.  
8 Because DFN is already operating as a CLEC, it is familiar with the Commission's consumer  
9 protection and service quality rules. Moreover, as an Oregon business, DFN understands that it  
10 must abide by Oregon's consumer protection law. DFN is committed to strict adherence with  
11 applicable consumer privacy rules, and is equally committed to working constructively with the  
12 Commission to resolve customer complaints received by the Commission staff. DFN has  
13 designated Todd Way to work directly with the Commission's Consumer Services Complaint  
14 Division to resolve any complaints the Commission may receive (checklist item 10.2).

15 **11. Designation on Tribal Lands**

16 Checklist item 11, and its subparts, set forth the Commission's requirements for  
17 applicants requesting designation on Tribal lands, including notice to the appropriate Tribal  
18 government, a summary of Tribal engagement efforts, and the results of such efforts. Because  
19 DFN is not seeking designation on Tribal lands at this time, these requirements are inapplicable  
20 to this application.

21 **12. Public interest showing**

22 Requirement 12.1 asks for a "[d]emonstration that designation would be in the public  
23 interest," specifically addressing increase in consumer choice (12.1.1), advantages and  
24 disadvantages of the applicant's service offering (12.1.2), and any other specific criteria  
25 determined by the Commission (12.1.3). As demonstrated below, DFN's requested  
26 designation as an ETC and ETP is in the public interest.

The requested designation of DFN as an ETC and ETP will provide better service for  
customers in Douglas and Lane counties. The purpose of the RDOF auction is to extend

1 service to locations that do not have 25/3 or greater broadband connection. The designation of  
2 DFN will make available federal funds for DFN to expand, maintain, and upgrade its high-speed  
3 fiber optic networks within Douglas and Lane counties, providing high-quality voice and  
4 broadband services to rural customers there. DFN's plans to improve and expand its network  
5 will allow it to provide voice and gigabyte broadband services to additional rural residents in  
6 Douglas and Lane counties. Besides being able to reach additional customers, DFN anticipates  
7 being able to provide higher-quality services, including the ability to offer faster broadband  
8 speeds to a greater proportion of its customers in rural areas. DFN's fiber-based voice service  
9 offerings provide a high-quality product for rural customers, and its broadband services provide  
10 speeds of up to 1 Gbps – a speed comparable to the fastest ILEC speeds offered in the Portland  
11 metro area – to customers in Douglas and Lane counties. These factors alone merit a finding  
12 that designation here is in the public interest.

11 **13. Commitment to provide reports as required**

12 Checklist item 13 reflects the obligation of ETCs and ETPs to provide annual ETC  
13 reports and such other reports as required by the Commission's rules. With respect to checklist  
14 item 13.1, DFN commits to comply with all annual reports required by the Commission's rules.  
15 In addition, in satisfaction of item 13.2, DFN commits to cooperate with the Commission staff  
16 in providing special weekly, monthly, or quarterly reports that Commission staff may reasonably  
17 find necessary based on program requirements and the circumstances of DFN, and which DFN,  
18 in good faith, commits to provide to the Commission.

18 **III. DFN MEETS THE REQUIREMENTS FOR ETP DESIGNATION**

19 As noted above, Commission requirement 8.1 requires ETC applicants to commit to offer  
20 and advertise Lifeline and OTAP services throughout the designated service area, which in turn  
21 requires designation as an ETP. Prior to Commission Order 15-382, the Commission required  
22 carriers to complete a separate application for ETP designation. However, in Order No. 15-382,  
23 the Commission streamlined the ETP application process by incorporating it into item number 8  
24 in the ETC "checklist." As the Commission explained: "New sub-requirements 8.4 and 8.5  
25 improve application review efficiency by incorporating the OTAP ETP requirements into the

1 ETC process." In section 1.8, supra, DFN affirmed its commitment to abide by sub-  
2 requirements 8.4 and 8.5. Accordingly, ETP designation is appropriate here.

3 **IV. CONCLUSION**

4 For the reasons explained above, DFN respectfully requests that the Commission  
5 grant its application for designation as an ETC for federal high-cost and Lifeline Universal  
6 Service Fund support and as an ETP in the designated service area identified by the census  
7 blocks listed in Exhibit A.

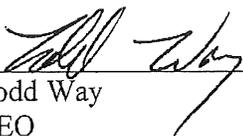
8 Dated this 15<sup>th</sup> day of December, 2020.

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10 \_\_\_\_\_  
11 RICHARD A. FINNIGAN,  
12 Attorney for Douglas Services, Inc.  
13 d/b/a Douglas Fast Net  
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AFFIDAVIT/CERTIFICATION

I, Todd Way, CEO of DFN, hereby certify that I have read the foregoing Application and am authorized to make the certifications contained therein on behalf of DFN.

Pursuant to the requirements set out in Order No. 06-292, Appendix A, Part 5.1, as an officer of DFN, I hereby attest, swear and certify that support funds received pursuant to 47 C.F.R. Part 54 will be used only for the intended purposes.

  
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Todd Way  
CEO

# EXHIBIT A

CENSUS BLOCKS

410190100001062
410190100001063
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# EXHIBIT B



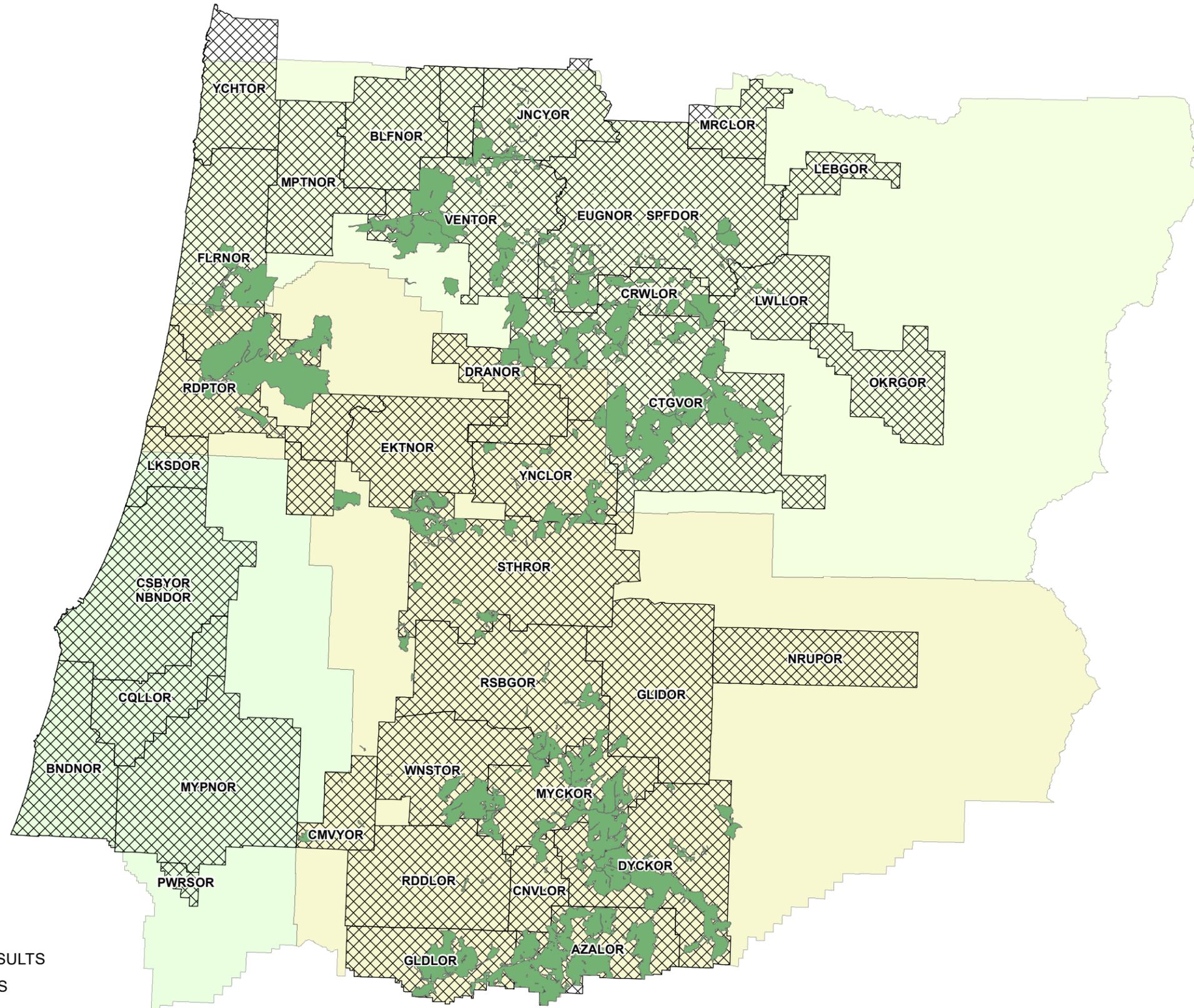
# DOUGLAS SERVICES AWARDED RURAL DIGITAL OPPORTUNITY FUND CENCUS BLOCKS



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

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

COMMENTS:



### LEGEND

- DFN RDOF RESULTS
- WIRE CENTERS
- LANE COUNTY
- DOUGLAS COUNTY
- COOS COUNTY



SHEET:

DESIGNED BY: RICK BRAMMER  
DATE: 12/1/2020  
VERSION:  
APPROVED BY: