

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Candace Shofstall
Legal Assistant
(360) 753-7012
candaces@localaccess.com

February 25, 2021

VIA E-MAIL

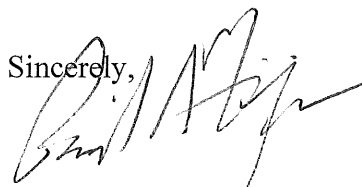
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: UM 2136 - Supplement to Application

Dear Sir/Madam:

Enclosed you will find the Supplement and Exhibit to the above referenced Application. This Supplement is to expand the area that Lifeline is available after a discussion with Commission Staff.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs

cc: Client (via e-mail)
Jon Cray (via e-mail)

1
2
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

UM 2136

SUPPLEMENT TO APPLICATION

13 On December 15, 2020, Douglas Services, Inc. d/b/a Douglas Fast Net (“DFN”) submitted
14 an Application for Designation as an Eligible Telecommunications Carrier and Eligible
15 Telecommunications Provider (the “Application”). The purpose of the Application is to obtain
16 designation as an Eligible Telecommunications Carrier (“ETC”) for those census blocks in which
17 DFN was awarded the ability to receive federal support under the Rural Digital Opportunity Fund
18 (“RDOF”) auction.
19

20 This Supplement now seeks to expand the areas for which ETC designation (along with
21 Eligible Telecommunications Provider (“ETP”) designation) is sought. DFN has facilities in the
22 areas that are identified below and seeks the ability to provide Lifeline service in those areas in
23 which it has facilities. Thus, the need for ETC and ETP status.
24

25
26 SUPPLEMENT TO APPLICATION
ETC AND ETP - 1

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, WA 98512
(360) 956-7001

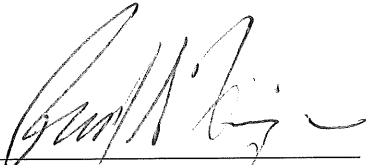
1 The areas that are covered by this Supplement are the Azalea and Days Creek wire centers
2 in which Frontier Communications Northwest, LLC d/b/a Ziply Fiber is the incumbent local
3 exchange carrier and the Cottage Grove and Culp Creek wire centers in which CenturyTel of
4 Oregon, Inc. d/b/a Lumen is the incumbent local exchange carrier.

5 The areas in which DFN seeks ETC and ETP status are identified as the areas for which it
6 has facilities. The current scope of those facilities in the wire centers identified above is set out on
7 Exhibit 1, which is a map of the area in which facilities have been constructed to date. It is
8 expected that there will be additional construction in the future and the ETC and ETP designation
9 should apply to the areas within the wire centers where DFN has facilities now or in the future.¹

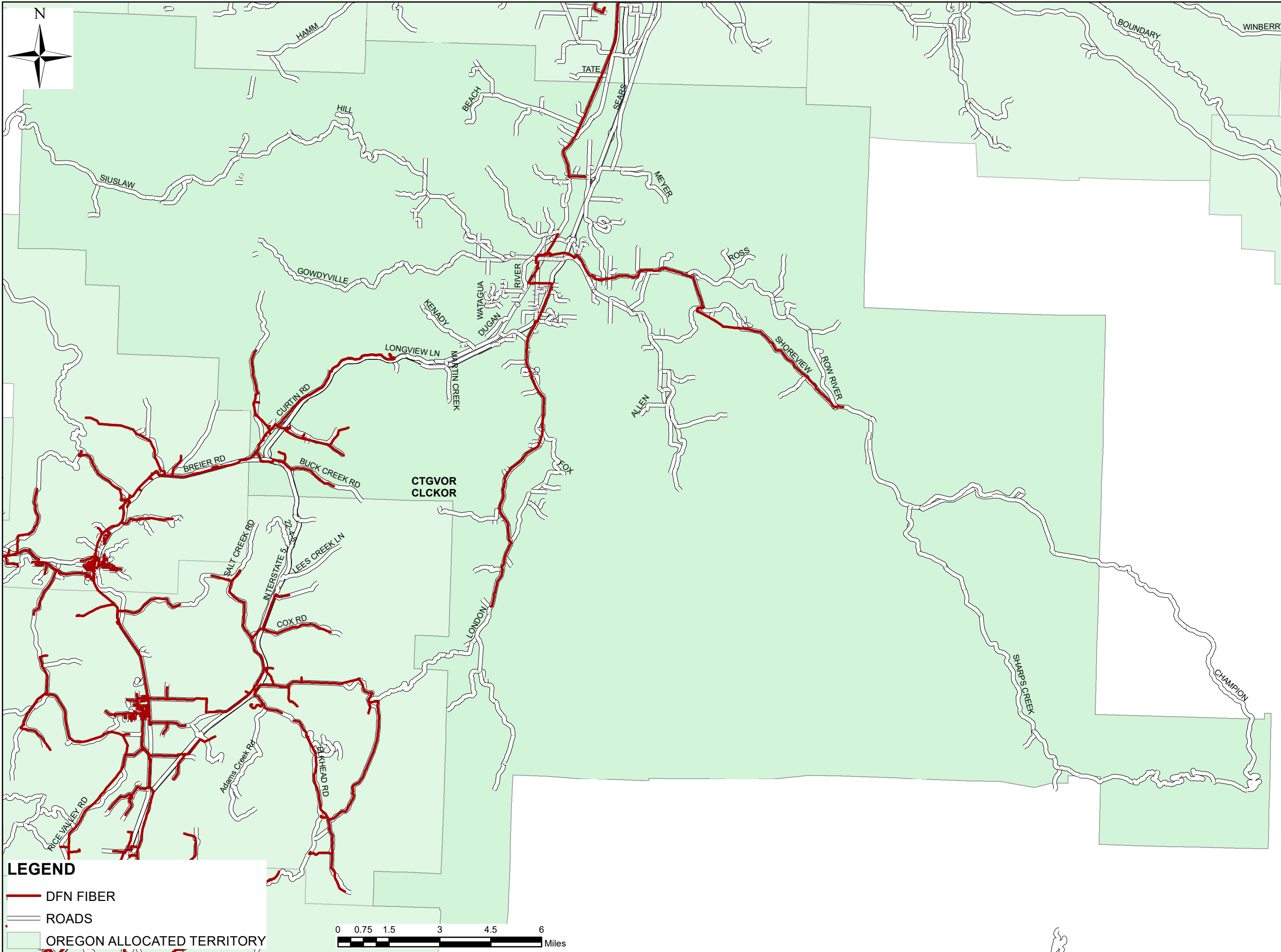
10 The information that is set out in the Application in this docket should be viewed as
11 applying to this Supplement. The areas set out in Exhibit 1 are in addition to the RDOF census
12 blocks.
13

14 Thank you for your attention to this matter.

15 Respectfully submitted this 25th day of February, 2021.
16

17 
18
19 RICHARD A. FINNIGAN,
20 Attorney for Douglas Services, Inc.
21 d/b/a Douglas Fast Net
22

23 ¹ To the extent that DFN has not provided all of the information required under Section 4 of Appendix A of
24 Commission Order No. 15-382 in Docket UM 648, DFN requests a waiver. For example, the ILEC code and
25 a specific identification of units.



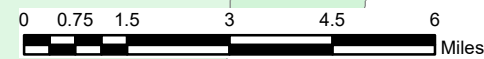
DOUGLAS SERVICES INC.
 2350 NW AVIATION DR
 ROSEBURG, OR 97470
 541-673-4242

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

COMMENTS:

LEGEND

- DFN FIBER
- ROADS
- OREGON ALLOCATED TERRITORY



SHEET: CTGVOR, CLCKOR

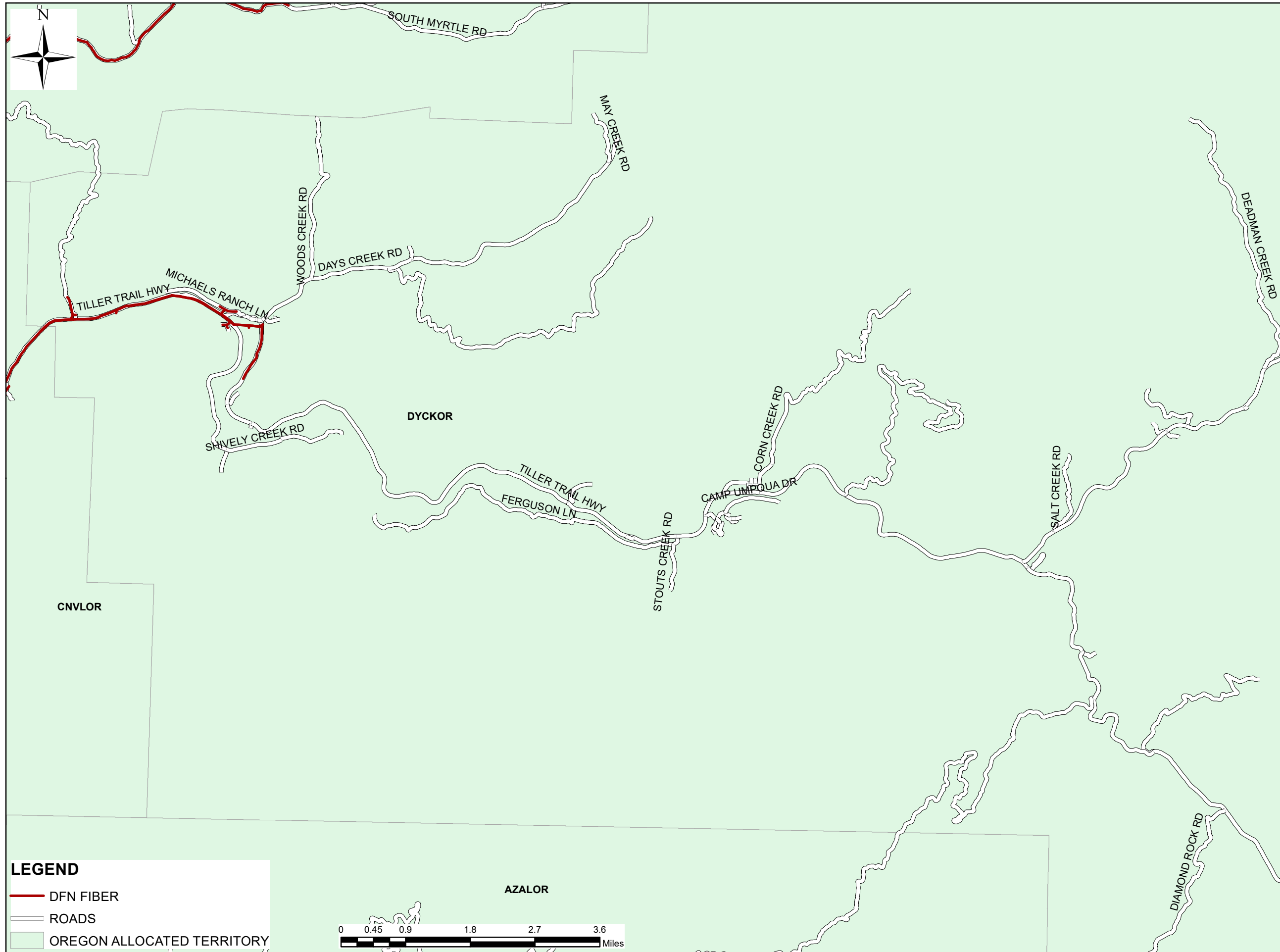
DESIGNED BY: RICK BRAMMER
 DATE: 2/24/2021
 VERSION:
 APPROVED BY:



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

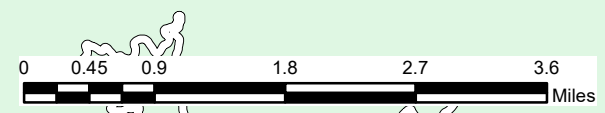
SITE: (SITE NAME)
 PROPOSED LOCATION:
 (ADDRESS)
 (LAT/LON)

COMMENTS:



LEGEND

- DFN FIBER
- ROADS
- OREGON ALLOCATED TERRITORY



SHEET: DYCKOR

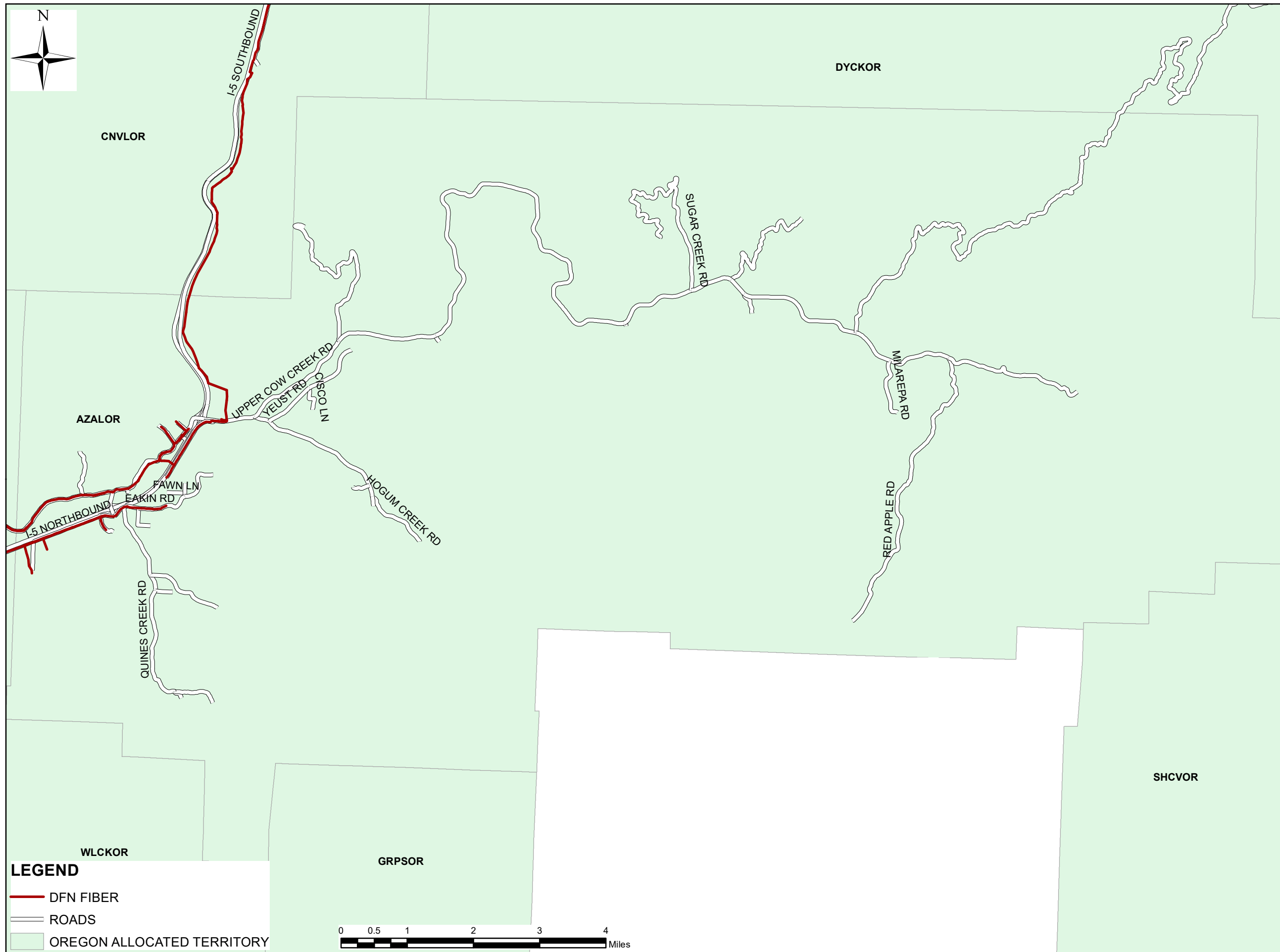
DESIGNED BY: RICK BRAMMER
 DATE: 2/24/2021
 VERSION:
 APPROVED BY:



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

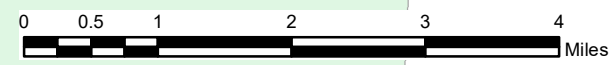
SITE: (SITE NAME)
 PROPOSED LOCATION:
 (ADDRESS)
 (LAT/LON)

COMMENTS:



LEGEND

- DFN FIBER
- ROADS
- OREGON ALLOCATED TERRITORY



SHEET: AZALOR

DESIGNED BY: RICK BRAMMER
 DATE: 2/24/2021
 VERSION:
 APPROVED BY: