

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: May 4, 2021**

REGULAR CONSENT EFFECTIVE DATE _____ N/A _____

DATE: April 23, 2021

TO: Public Utility Commission

FROM: Bret Farrell

THROUGH: Bryan Conway and Caroline Moore **SIGNED**

SUBJECT: DOUGLAS SERVICES, INC. D/B/A DOUGLAS FAST NET:
(Docket No. UM 2136)
Application for Designation As An Eligible Telecommunications Carrier
and Eligible Telecommunications Provider.

STAFF RECOMMENDATION:

Staff recommends the Commission grant the request of Douglas Services, Inc. d/b/a Douglas Fast Net (DFN) for designation as a federal Eligible Telecommunications Carrier (ETC) for the purposes of receiving Rural Digital Opportunity Fund Phase I (RDOF) and Lifeline federal universal service funds, and for designation as an Eligible Telecommunications Provider (ETP) to participate in the Oregon Telephone Assistance Program (OTAP), in the census blocks listed in Attachment A.

The designations are prerequisites to DFN's receipt of federal universal service funds associated with its winning bids in the RDOF Auction 904. These funds will enable DFN to deliver gigabit-speed internet access service to 6,428 locations in certain census blocks in rural areas of Douglas and Lane counties. ETC and ETP designations will also facilitate the expansion of voice and Lifeline services in those areas.

To ensure that DFN meets federal deadlines for this funding, Staff also recommends that a designation order be issued as early as possible, but no later than June 7, 2021.

DISCUSSION:

Issue

Whether the Commission should designate DFN as an ETC and ETP in the census blocks listed in Attachment A.

Applicable Law

Section 214(e)(2) of the Federal Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the Act), delegates authority to state commissions to designate common carriers that are eligible to receive federal universal service support, i.e., ETCs. State commissions may confer federal ETC status on ILECs or competitive common carriers that meet the conditions set out in Section 214(e)(1) of the Act. In general, those conditions require that the ETC offer and advertise, throughout its designated service area, the services that are supported by federal universal service support mechanisms. The carrier must provide the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's service.

Each state may adopt specific requirements for ETC designation that are consistent with requirements of the Act. The Commission updated its own set of requirements for federal ETC designation in Docket No. UM 1648, Order No. 15-382, entered December 1, 2015 (ETC Order). These are listed in Appendix A to the ETC Order.

Federal Communications Commission (FCC) rules require that an ETC offer Lifeline services to qualifying low-income customers within its designated service area. In order to offer Lifeline services in Oregon, a carrier must be designated as an ETP to participate in the OTAP, which is the state-mandated counterpart of the FCC Lifeline program. OTAP requirements are based on Residential Service Protection law found in ORS 759.687 and Chapter 290, Sections 2-6 and 16, Oregon Laws 1987 as amended. Commission rules governing OTAP are found in Chapter 860, Division 033 of the Oregon Administrative Rules

Analysis

The Applicant and Previous Designations

DFN is a wholly owned subsidiary of Douglas Electric Cooperative. The company was formed in 2001 and is a competitive provider of broadband and voice services to residential, business, and institutional customers in Douglas, Lane, and Coos Counties. The company holds a certificate of authority to provide telecommunications service as a competitive provider.¹ DFN currently provides broadband services to more than 6,000 customers and voice services to more than 2,000 customers.

¹ Order No. 09-322 in Docket No. CP 1452.

The Commission has previously granted ETC and ETP designations to DFN in previous dockets, however these previous designations did not include the census blocks which DFN was awarded in the RDOF auction, and which the company now seeks designation in. On February 15, 2019, the Commission issued Order No. 19-040, which designated DFN as a federal Eligible Telecommunications Carrier (ETC) for the purposes of receiving Connect America Fund Phase II (CAF II) and Lifeline federal universal service funds, and for designation as an Eligible Telecommunications Provider (ETP) to participate in the Oregon Telephone Assistance Program (OTAP).

In February 2018, the Commission granted ETC status to DFN to enable it to receive support from the Oregon Universal Service Fund (OUSF) in the Camas Valley, Drain, Glide, Yoncalla, Sutherlin, and Winston wire center areas.² At the same time, DFN was granted ETC and ETP status to offer federal and state Lifeline services in those areas. In October 2018, the Commission granted DFN's request to extend its designated service area for Lifeline and OTAP services to include all of the Roseburg wire center area. Subsequently, in October 2018, the Commission granted DFN's request to extend its designated service area for Lifeline and OTAP services to include all of the Roseburg wire center area.³

In May 2015, the Commission granted designations to enable DFN to receive \$2.375 million of federal high-cost support funding through the FCC's Rural Broadband Experiment (RBE). That funding was granted to support DFN's delivery of high-speed internet access and voice services to 2,495 locations in selected census blocks in the remote foothills of the Cascade and Coastal mountain ranges of southwestern Oregon.⁴

The Current Application

On December 15, 2020, DFN filed the application at issue here. The company requests designation as a federal ETC and as a ETP to enable it to receive just over \$25 million of federal universal service RDOF support for which it had submitted winning bids in the FCC's Auction 904. This support, which is to be paid out over ten years, is intended to help DFN bring gigabit-speed service to 6,428 locations in the specific census blocks listed in Attachment A. These census blocks are located in rural areas of Douglas and Lane counties. As part of the ETC designation for high-cost funds, DFN is obligated to offer Lifeline services in the same areas. ETP designation, which is also required, will enable DFN to participate in the OTAP program and offer supplemental support to qualifying low-income consumers.

DFN participated in the RDOF auction as a member of the Rural Electric Cooperative Consortium, which was announced as a provisional winning bidder in several states including Oregon, in December 2020. The Consortium subsequently assigned the winning bid in Oregon to DFN; therefore, DFN is the entity that must fulfill the

² Order No. 18-040 in Docket No. UM 1896 (February 2, 2018).

³ Order No. 18-417 in Docket No. UM 1896 (October 23, 2018).

⁴ Order No. 15-159 in Docket No. UM 1721 (May 19, 2015).

obligations associated with the auction. The notice announcing the winners also contained post-auction procedures and filing requirements for winning bidders. DFN has filed all post-auction information required by the FCC to date. In order to complete all requirements and begin receiving support, however, DFN must file documentation of its ETC designation from the Oregon Commission by June 7, 2021, or seek a waiver of this requirement.⁵

The Rural Digital Opportunity Fund was designed to build off of the Connect America Fund auction by using reverse auctions in two phases. The FCC sought to balance the realities of a finite budget and the high cost of providing broadband in more remote rural areas. To facilitate technological neutrality among various types of network providers, the FCC established four performance tiers (speeds and usage allowances) and two latency tiers (low and high), which were weighted to reflect preferences toward higher speeds and usage allowances, and lower latency. Bidders were required to choose their performance tiers and latency tiers prior to bidding. DFN chose the Gigabit performance tier (speed at least 1 Gbps downstream and 500 Mbps upstream, and a usage allowance of 2 terabytes per month), and the low latency tier (100 milliseconds or less). As a result, DFN is obligated to meet these requirements, in addition to other specific requirements (discussed below), in the areas where it will receive RDOF funding.

Staff's Review and Analysis

Staff reviewed the application and issued a data request for additional information that DFN had filed with the FCC following the RDOF auction, this included the FCC's "long form application" submitted by winning bidders after the auction.

DFN's application, in conjunction with information submitted to the FCC, demonstrates that it satisfies the Commission's ETC requirements as discussed below. The following numbers correspond to the application requirements in Appendix A of the ETC Order.

1. Information regarding applicant and its common carrier status: DFN is a common carrier certificated to offer local exchange and interexchange services in Oregon.⁶ DFN offers services across Douglas County and portions of Lane and Coos counties, providing broadband services to more than 6,000 customers and voice services to more than 2,000 customers. The company has been in business since 2001. Staff has reviewed financial materials submitted by DFN and found that the company is financially and technically capable of providing the supported services in compliance with FCC and Commission rules.
2. Type of Federal Universal Service support for which designation is requested: DFN requests designation to receive federal high-cost support from the RDOF Auction 904, as well as Lifeline support.

⁵ FCC Public Notice DA 20-1422, released December 7, 2020.

⁶ DFN was originally certificated in Order No. 01-902 and later in Order No. 09-322.

3. Commitment and ability to provide all supported services: DFN commits to provide the supported services within the proposed designated service area. These include voice services as defined in 47 CFR §54.101 (a), with a stand-alone voice service offering, and a broadband internet access service offering that meets the applicable FCC requirements. DFN's current service offerings are posted on its website.
4. Identification and definition of proposed designated service and commitment to serve: DFN identifies its proposed designated service area in terms of census blocks consistent with its auction award in Attachment A to its application. The application also includes a map of the proposed designated service area which is included as Attachment B of this memo. No Tribal Lands are included. DFN commits to provide the supported services throughout the designated service area. The FCC requires that Rural Digital Opportunity Fund support recipients must offer commercially at least one voice and one broadband service meeting the relevant service requirements to all locations within the awarded area in the following timeframe: 40 percent of the required number of locations in a state by the end of third year of support and an additional 20 percent by the end of the fourth and fifth years of support.⁷
5. Types of facilities used to provide supported services: DFN uses state-of-the-art fiber networks to serve customers, and plans to continue to use and expand this network to serve customers throughout the proposed designated service area. DFN plans to provide customers with Fiber-to-the-Home or Fiber-to-the Node service based on technical feasibility and proximity to DFN's fiber network. DFN's commitment is to provide gigabyte Internet connection in the RDOF areas. DFN already has interconnection agreements in place with Lumen and Zipy.
6. Commitment to use support in accordance with rules: DFN's application includes an affidavit certifying that it will use the support funds only for the intended purposes. DFN also certifies in its application that it will comply with the service requirements applicable to the support it receives, including without limitation, the Commission's rules and orders governing ETCs and ETPs, and the applicable provisions of the FCC rules, 47 C.F.R. § 54.101, et seq., including all applicable limitations on use of funds and reporting requirements. Additionally, the ETC Order requires an applicant for high-cost support to submit a five-year network plan demonstrating how the applicant will use the support funds. The FCC waived the requirement that winning bidders filed a five-year plan of its network investments because it found "that such obligations were no longer essential to the [FCC's] ability to monitor ETC use of support for its intended purpose."⁸ Staff

⁷ FCC Order 20-5, released February 7, 2020 para. 48.

⁸ FCC Public Notice DA 20-1422 para. 36.

agrees with the FCC's reasoning in this regard. Also, the required buildout targets as described in requirement No. 4 above, in conjunction with network descriptions included in the company's application, meet the intended purpose of a plan.

7. Commitment to advertise high-cost supported services throughout the service area: DFN commits to advertise the availability of the supported services and the relevant charges using media of general distribution, including the internet. It is in the company's interest to advertise in order to gain customers and associated revenues.
8. Commitment to offer and advertise Lifeline and OTAP services: DFN commits to offer and advertise Lifeline and OTAP services throughout the designated service area. DFN commits that it will continue to offer the Lifeline discounts on its voice-only basic telephone service offering that will not exceed \$34.99 per month. DFN also commits that customers qualifying for Lifeline will also be permitted to apply the Lifeline discount to DFN's bundled service plans that include voice and broadband. DFN reaffirms its commitment to advertise the availability of its Lifeline and OTAP service offerings throughout its designated service area.
9. Ability to remain functional in emergencies: DFN certifies that it has sufficient back-up power to ensure functionality without an external power source. In addition, DFN has sufficient excess capacity and/or redundancy in its network that it can re-route traffic around damaged facilities. DFN also certifies it is able to manage traffic spikes resulting from emergency situations. E911 is deployed and fully functional. DFN commits to comply with Oregon's 9-1-1 emergency reporting system tax requirements.
10. Commitment to service quality and consumer protection standards: DFN commits to specific, objective measures for service quality and consumer protection, including adherence to Commission rules for wireline carriers. As an operating CLEC, DFN is familiar with Commission consumer protection and service quality rules. The company also commits to work with the Commission to resolve customer complaints and designates Todd Way as DFN's contact person for complaints.
11. Designation on Tribal Lands: These requirements do not apply as DFN is not seeking designation on Tribal Lands.
12. Public interest showing: Designation of DFN as an ETC to receive federal universal service funds is in the public interest. DFN's designation will bring gigabit-speed internet access service to customers in the designated service area, as well as competitive voice services and Lifeline discounts for qualifying low-income customers.

13. Commitment to provide reports as required: Annual reporting requirements for designated ETCs are set forth in Appendix A of the ETC Order 15-382. DFN agrees to abide by all ETC annual reporting requirements established by the commission. DFN commits to cooperate with the Commission staff in providing special weekly, monthly, or quarterly reports that Commission staff may reasonably find necessary based on program requirements and the circumstances of DFN.

As to ETP requirements, DFN requests ETP designation to participate in the OTAP and offer Lifeline services. In response to ETC requirement No. 8 above, commits to abide by all OTAP and RSPF rules and procedures.

No party filed to intervene in the docket.

Conclusion

Staff finds DFN's application demonstrates the carrier has satisfied eligibility requirements for ETC and ETP designation for purposes of receiving RDOF, Lifeline, and OTAP support. Staff finds granting DFN's application without further review satisfies the public interest. If the commission issues an ETC designation order as soon as possible, but not later than June 7, 2021, it will enable DFN to meet the FCC's deadline to receive funding.

PROPOSED COMMISSION MOTION:

Approve the request of Douglas Services, Inc. d/b/a Douglas Fast Net to be designated as a federal ETC for purposes of receiving RDOF high-cost and Lifeline federal universal service support funds, and as an ETP to participate in the OTAP, in the census block groups listed in Attachment A.

Attachment A

CENSUS BLOCKS

410190100001062	410192100001833	410390008002118
410190100001063	410192100002003	410390008002132
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410190100001111	410192100002027	410390008002161
410190100001112	410192100002042	410390008002162
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410190100001128	410192100002053	410390009021010
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410190100001291	410192100002233	410390009021047
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Attachment B

