

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2136

In the Matter of

DOUGLAS SERVICES, INC., dba
DOUGLAS FAST NET,

Application for Designation as an Eligible
Telecommunications Carrier (ETC) and
Eligible Telecommunications Provider (ETP).

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on May 4, 2021, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.



BY THE COMMISSION:

A handwritten signature in blue ink, appearing to read "Nolan Moser".

Nolan Moser

Chief Administrative Law Judge

A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA9

**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.

Docket No. UM 2136

April 23, 2021

Page 3

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 voices 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
410190100001100	410192100002005	410390008002137
410190100001102	410192100002013	410390008002147
410190100001107	410192100002018	410390008002150
410190100001108	410192100002019	410390008002154
410190100001109	410192100002023	410390008002155
410190100001110	410192100002024	410390008002160
410190100001111	410192100002027	410390008002161
410190100001112	410192100002042	410390008002162
410190100001114	410192100002043	410390008002167
410190100001115	410192100002049	410390009021005
410190100001125	410192100002052	410390009021009
410190100001128	410192100002053	410390009021010
410190100001129	410192100002054	410390009021013
410190100001154	410192100002055	410390009021014
410190100001162	410192100002057	410390009021016
410190100001214	410192100002058	410390009021022
410190100001217	410192100002067	410390009021023
410190100001241	410192100002126	410390009021027
410190100001242	410192100002140	410390009021028
410190100001254	410192100002161	410390009021029
410190100001255	410192100002180	410390009021033
410190100001291	410192100002233	410390009021047
410190100001292	410192100002234	410390009021050
410190100001297	410192100002235	410390009021059
410190100001299	410192100002242	410390009021060
410190100001314	410192100002243	410390009021061
410190100001318	410192100002244	410390009021062
410190100001323	410192100002249	410390009021063
410190100001324	410192100002250	410390009021064
410190100001445	410192100002253	410390009021067
410190100001453	410192100002254	410390009021068
410190100001456	410192100002256	410390009021071
410190100001502	410192100002257	410390009021074
410190100001513	410192100002261	410390009021084
410190100001516	410192100002262	410390009021085
410190100001517	410192100002263	410390009021096
410190100001519	410192100002264	410390009021097
410190200002057	410192100002265	410390009021099
410190200002059	410192100002267	410390009021172
410190200002060	410192100002320	410390009021173

Docket No. UM 2136
April 23, 2021
Page 9

410190200002071	410192100002321	410390009022003
410190200002072	410192100002324	410390009022017
410190200002156	410192100002325	410390009022018
410190200002284	410192100002331	410390009022019
410190300001023	410192100002332	410390009022036
410190300001051	410192100002337	410390009022054
410190300001061	410192100003015	410390009022055
410190300001154	410192100003034	410390009022060
410190300001204	410192100003043	410390009022083
410190300002043	410192100003044	410390009022093
410190300002125	410192100003062	410390009023005
410190300002330	410192100004001	410390009023006
410190300002342	410192100004004	410390009023012
410190300002365	410192100004005	410390009023014
410190300002388	410192100004009	410390009023015
410190300002394	410192100004013	410390009023016
410190300002400	410192100004015	410390009023019
410190300002401	410192100004035	410390009024007
410190300002402	410192100004037	410390009024008
410190300002404	410192100004048	410390009024009
410190300002426	410192100004050	410390009024012
410190300002427	410192100004051	410390009024015
410190300002430	410192100004055	410390009024021
410190300002437	410192100004060	410390009024031
410190300002438	410192100004064	410390009024035
410190300002441	410192100004068	410390009024036
410190300002445	410192100004101	410390009024040
410190300002446	410192100004103	410390009024041
410190300002452	410192100004159	410390009024048
410190300002453	410192100004160	410390009024054
410190300002467	410192100004163	410390009024056
410190300002475	410192100004171	410390009024058
410190300002476	410192100004179	410390009024059
410190300002481	410192100004184	410390009024063
410190300002519	410192100004185	410390009024066
410190300002530	410192100004193	410390009024070
410190300002532	410192100004196	410390009024073
410190300002533	410192100004197	410390009024077
410190300003000	410192100004200	410390009024078
410190300003006	410192100004203	410390009041004
410190300003011	410192100004204	410390009041007
410190300003012	410192100004205	410390009041016
410190400001035	410192100004206	410390009041019
410190400001038	410192100004207	410390009041020
410190400001087	410192100004210	410390009041027
410190400001089	410192100004211	410390009041031
410190400001110	410192100004212	410390009041033
410190400001112	410192100004213	410390009041038
410190400001115	410192100004217	410390009041040

Docket No. UM 2136
April 23, 2021
Page 10

410190400001116	410192100004219	410390009041041
410190400001128	410192100004220	410390009041045
410190400001142	410192100004221	410390009041046
410190400001143	410192100004222	410390009041047
410190400001154	410192100004227	410390009041048
410190400001155	410192100004228	410390009041051
410190400001158	410192100004235	410390009041053
410190400001162	410192100004236	410390009041055
410190400001164	410192100004249	410390009041057
410190400001165	410192100004251	410390010021010
410190400001166	410192100004256	410390010021012
410190400001169	410192100004257	410390010021015
410190400001170	410192100004258	410390010021016
410190400001177	410192100004259	410390010021023
410190400001178	410192100004263	410390010021024
410190400001180	410192100004266	410390010021025
410190400001181	410192100004267	410390010021029
410190400001182	410192100004268	410390010021031
410190400001183	410192100004269	410390010021047
410190400001184	410192100004270	410390010021048
410190400001193	410192100004271	410390010021053
410190400001200	410192100004272	410390010021054
410190400001202	410192100004274	410390010021058
410190400001203	410192100004275	410390010021060
410190400001213	410192100004276	410390010021061
410190400001218	410192100004277	410390010021063
410190400001220	410192100004280	410390010021068
410190400001223	410192100004281	410390010021071
410190400001224	410192100004282	410390010021075
410190400001231	410192100004283	410390010021077
410190400001239	410192100004285	410390010021080
410190400001240	410192100004287	410390010021081
410190400002009	410192100004289	410390010021084
410190400003006	410192100004290	410390010021085
410190400003018	410192100004297	410390010021086
410191700001070	410192100004298	410390010021089
410191700001072	410192100004299	410390010021092
410191700001073	410192100004300	410390012011038
410191700001074	410192100004302	410390012011040
410191700001075	410192100004313	410390012011041
410191700001076	410192100004330	410390012011042
410191700001077	410192100004331	410390012011044
410191700001079	410192100004332	410390012011051
410191700001080	410192100004336	410390012011055
410191700001082	410192100004339	410390012011058
410191700001083	410192100004340	410390012011066
410191700001085	410192100004361	410390012011067
410191700001087	410192100004363	410390012011070
410191700001089	410192100004366	410390012011090

Docket No. UM 2136
April 23, 2021
Page 11

410191700001090	410192100004374	410390012011091
410191700001094	410192100004375	410390012011097
410191700001096	410192100004376	410390012011099
410191700001097	410192100004384	410390012011102
410191700001100	410192100004393	410390012011132
410191700001101	410192100004394	410390012012000
410191700001102	410192100004395	410390012012001
410191700001107	410192100004397	410390012012003
410191700001110	410192100004403	410390012012066
410191700001113	410192100004425	410390012012067
410191700001114	410192100004426	410390012013002
410191700001121	410192100004435	410390012021000
410191700001122	410192100004436	410390012021005
410191700001123	410192100004438	410390012021007
410191700001125	410192100004445	410390012021008
410191700001126	410192100004449	410390012021009
410191700001128	410192100004450	410390012021010
410191700001130	410192100004455	410390012021013
410191700001191	410192100004457	410390012021018
410191700002023	410192100004461	410390012021019
410191700002072	410192100004467	410390012021021
410191700002129	410192100004495	410390012021024
410191700002234	410192100004497	410390012021025
410191700002275	410192100004498	410390012021027
410191700002309	410192100004499	410390012021028
410191700002373	410192100004500	410390012021036
410191800001003	410192100004510	410390012021037
410191800001026	410192100004511	410390012021070
410191800001027	410192100004521	410390012021106
410191800001028	410192100004525	410390013011002
410191800001029	410192100004530	410390013011004
410191800001037	410192100004531	410390013011009
410191800001039	410192100004544	410390013011010
410190400003032	410192100005321	410390013011011
410190400003055	410192100005326	410390013011012
410190400003062	410192100005331	410390011011125
410190400003063	410192100005333	410390011013000
410190400003087	410192100005426	410390011013059
410190400003113	410192100005440	410390011021004
410190400003115	410192100005444	410390011021008
410190400003116	410192100005446	410390011021016
410190400003119	410192100005447	410390011021022
410190400003121	410192100005449	410390011021023
410190400003122	410192100005452	410390011021025
410190400003123	410192100005454	410390011021027
410190400003125	410192100005468	410390011022052
410190400003127	410192100005485	410390011022054
410190400003128	410192100005487	410390011022055
410190400003150	410192100005488	410390011022056

Docket No. UM 2136
April 23, 2021
Page 12

410190500011015	410192100005490	410390011023002
410190500011049	410192100005491	410390011023003
410190500011051	410192100005534	410390011023031
410190500011359	410192100005535	410390011023035
410190500012003	410192100005536	410390011023041
410190500012010	410192100005537	410390011023043
410190600002017	410192100005541	410390011023045
410190600002021	410192100005545	410390011023046
410190600002025	410192100005546	410390011023047
410190600002026	410192100005552	410390011023069
410190600002027	410192100005559	410390011023070
410190600002030	410192100005567	410390011023071
410190600002031	410192100005568	410390011023072
410190600002034	410192100005569	410390011023078
410190600002062	410192100005572	410390012011003
410190600003002	410192100005584	410390012011004
410190700002114	410192100005618	410390012011006
410190700002118	410390004021002	410390012011008
410190700002121	410390004021017	410390012011012
410190700002155	410390004021023	410390012011013
410190700002159	410390004021038	410390012011015
410190700002160	410390004021040	410390012011017
410190700002161	410390004021041	410390012011019
410190700002162	410390004021042	410390012011020
410190700002415	410390004021044	410390012011021
410190700002574	410390004021047	410390012011024
410190700002579	410390004021048	410390012011025
410190900003014	410390004021049	410390012011026
410190900003055	410390004021050	410390012011027
410190900003066	410390004021052	410390012011029
410190900003069	410390004021053	410390012011030
410191100002011	410390004021055	410390012011035
410191100002037	410390004021056	410390012011036
410191100002040	410390004021057	410390010021094
410191100002045	410390004021058	410390010021095
410191100002046	410390004021059	410390010021096
410191100002052	410390004021067	410390010023008
410191100002054	410390004021068	410390010023011
410191100002055	410390004021069	410390010023012
410191100002059	410390004021071	410390010023013
410191100002060	410390004021072	410390010023016
410191100002068	410390004021073	410390010023017
410191100002079	410390004021074	410390010023019
410191100002085	410390004021075	410390010023020
410191100002090	410390004021078	410390010023021
410191100002123	410390004021080	410390010023023
410191100002166	410390004021082	410390010023025
410191100002167	410390004021084	410390010023027
410191100002168	410390004021093	410390010023029

Docket No. UM 2136
April 23, 2021
Page 13

410191100002177	410390004021094	410390010023033
410191100002180	410390004021096	410390010023035
410191100002184	410390004021099	410390010023036
410191100002197	410390004021103	410390011011005
410191100003012	410390004021106	410390011011015
410191100003013	410390004021108	410390011011016
410191100003020	410390004021113	410390011011021
410191100003021	410390004021114	410390011011022
410191100003034	410390004021115	410390011011023
410191100003037	410390004021116	410390011011026
410191100003041	410390004021117	410390011011035
410191100003060	410390004021125	410390011011040
410191100003068	410390004021126	410390011011050
410191200001003	410390004021127	410390011011053
410191200001034	410390004021131	410390011011056
410191600005029	410390004021134	410390011011057
410191600005031	410390004021136	410390011011058
410191700001007	410390004021138	410390011011080
410191700001008	410390004022013	410390011011088
410191700001011	410390004022025	410390011011089
410191700001014	410390004022034	410390011011097
410191700001015	410390004022039	410390011011099
410191700001039	410390004022040	410390011011100
410191700001042	410390004022060	410390011011106
410191700001045	410390004023008	410390011011107
410191700001052	410390004023009	410390011011112
410191700001053	410390004023023	410390011011114
410191700001068	410390004023028	410390011011115
410191700001069	410390004023043	410390011011116
410191800001040	410390004023046	410390011011117
410191800001046	410390004023051	410390011011118
410191800001047	410390007021070	410390014002153
410191800001060	410390007021071	410390014002154
410191800001079	410390007021075	410390014002156
410191800001125	410390007021104	410390014002157
410191800001126	410390007021113	410390014002159
410191800001127	410390007021119	410390014002160
410191800001128	410390007021120	410390014002162
410191800001129	410390007021121	410390014002163
410191800001133	410390007021124	410390014002164
410191800001134	410390007021125	410390014002166
410191800001135	410390007021126	410390014002167
410191800001140	410390007021141	410390014002169
410191800001142	410390007021143	410390014002170
410191800001145	410390007021148	410390014002183
410191800001150	410390007021149	410390014002184
410191800002012	410390007021151	410390014002185
410191800002016	410390007021155	410390014002365
410191800002069	410390007021158	410390014002375

Docket No. UM 2136
April 23, 2021
Page 14

410191800002070	410390007021163	410390014002376
410191800002084	410390007021175	410390016001007
410191800002085	410390007021177	410390016001015
410191800002100	410390007021182	410390016001020
410191800002107	410390007021183	410390016001025
410191800002108	410390007021184	410390016001027
410191800002110	410390007021186	410390016001030
410191800002113	410390007021191	410390016001031
410191800002114	410390007021195	410390016001032
410191800002115	410390007021196	410390016001033
410191800002120	410390007022035	410390016001053
410191800002132	410390007022046	410390016001055
410191800002133	410390007022077	410390016002009
410191800002140	410390008001002	410390016002013
410191800002141	410390008001003	410390016002015
410191800002145	410390008001004	410390016002018
410191800002147	410390008001007	410390016002033
410191800002170	410390008001009	410390016005006
410191800002174	410390008001010	410390016005011
410191800002175	410390008001012	410390016005024
410191800002176	410390008001013	410390017001000
410191800002180	410390008001015	410390017001006
410191800002182	410390008001021	410390017001047
410191800002183	410390008001024	410390017001056
410191800002184	410390008001025	410390017001058
410191800002187	410390008001030	410390017001060
410191800002198	410390008001032	410390017002028
410191800002204	410390008001035	410390017002033
410191800002205	410390008001040	410390017002035
410191800002211	410390008001042	410390014001070
410191800002212	410390008001045	410390014001074
410191800002216	410390008001047	410390014001075
410191800002217	410390008001051	410390014001076
410191800002218	410390008001057	410390014001077
410191800002219	410390008001062	410390014001078
410191800002221	410390008001063	410390014001080
410191800002222	410390008001065	410390014001082
410191800002223	410390008001066	410390014001083
410191800002231	410390008001068	410390014001084
410191800002234	410390008001069	410390014001087
410191800002237	410390008001070	410390014001090
410191800002239	410390008001071	410390014001091
410191800002240	410390008001088	410390014001093
410191800002242	410390008001095	410390014001098
410191800002248	410390008001101	410390014001101
410191800002252	410390008001104	410390014001102
410191800002287	410390008001105	410390014001104
410191800002292	410390008001109	410390014001107
410191800002293	410390008001112	410390014001108

Docket No. UM 2136
April 23, 2021
Page 15

410191800002294	410390008001114	410390014001168
410191800002295	410390008001116	410390014001170
410191800002302	410390008001120	410390014001171
410191800002304	410390008001126	410390014001172
410191800002305	410390008001129	410390014001173
410191900001011	410390008001136	410390014001180
410191900001016	410390008001137	410390014001183
410191900001023	410390008001141	410390014001187
410191900002066	410390008001142	410390014001205
410192000001002	410390008001146	410390014001206
410192000001110	410390008001147	410390014001217
410192000001114	410390008001149	410390014001240
410192000001121	410390008001150	410390014002029
410192000001143	410390008001151	410390014002032
410192000001146	410390008001152	410390014002055
410192000001182	410390008001160	410390014002059
410192000003044	410390008001166	410390014002060
410192000003046	410390008001177	410390014002061
410192000004000	410390008001250	410390014002062
410192100001129	410390008001285	410390014002063
410192100001174	410390008001316	410390014002065
410192100001175	410390008001317	410390014002067
410192100001187	410390008001319	410390014002078
410192100001189	410390008001320	410390014002079
410192100001214	410390008001321	410390014002082
410192100001466	410390008001323	410390014002086
410192100001473	410390008001344	410390014002143
410192100001479	410390008001363	410390013011013
410192100001506	410390008001378	410390013011014
410192100001515	410390008001388	410390013011015
410192100001544	410390008001394	410390013011036
410192100001552	410390008001460	410390013011039
410192100001553	410390008001461	410390013011040
410192100001555	410390008001468	410390013011046
410192100001556	410390008001469	410390013011047
410192100001562	410390008001470	410390013011048
410192100001563	410390008001472	410390013011053
410192100001564	410390008001485	410390013013003
410192100001565	410390008001493	410390013013004
410192100001566	410390008001500	410390013013005
410192100001567	410390008001502	410390013013006
410192100001568	410390008001508	410390013013007
410192100001570	410390008002005	410390013013008
410192100001571	410390008002006	410390013013009
410192100001583	410390008002010	410390013013010
410192100001584	410390008002013	410390013013015
410192100001585	410390008002016	410390013013023
410192100001586	410390008002019	410390013021004
410192100001587	410390008002021	410390013021012

Docket No. UM 2136
April 23, 2021
Page 16

410192100001588	410390008002024	410390013021030
410192100001590	410390008002026	410390013021050
410192100001594	410390008002028	410390013021054
410192100001597	410390008002029	410390013021055
410192100001598	410390008002030	410390013021058
410192100001611	410390008002037	410390013021069
410192100001614	410390008002044	410390013021070
410192100001616	410390008002046	410390013021071
410192100001617	410390008002052	410390013021072
410192100001618	410390008002053	410390013021074
410192100001623	410390008002054	410390014001022
410192100001626	410390008002055	410390014001034
410192100001627	410390008002056	410390014001038
410192100001634	410390008002057	410390014001042
410192100001635	410390008002059	410390014001043
410192100001636	410390008002060	410390014001054
410192100001641	410390008002062	410390014001057
410192100001642	410390008002065	410390014001058
410192100001643	410390008002069	410390014001060
410192100001647	410390008002080	410390014001061
410192100001648	410390008002081	410390014001063
410192100001653	410390008002082	410390014001065
410192100001654	410390008002085	410390014001066
410192100001663	410390008002088	410390014001067
410192100001675	410390008002091	410390014001069
410192100001695	410390008002093	410390017002045
410192100001725	410390008002094	410390017002046
410192100001735	410390008002096	410390017002047
410192100001808	410390008002097	410390017003002
410192100001809	410390008002098	410390017003038
410192100001813	410390008002099	410390017004002
410192100001815	410390008002102	410390017004006
410192100001824	410390008002103	410390017004021
410192100001825	410390008002105	410390017004026
410192100001827	410390008002106	410390017004039
410192100001830	410390008002110	410390017004041
410192100001832	410390008002115	410390018011021

Docket No. UM 2136
April 23, 2021
Page 17

Attachment B

