

ORDER NO. 21-188

ENTERED Jun 04 2021

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2149

In the Matter of

CHARTER FIBERLINK OR-CCVII, LLC,

Application for Designation as an Eligible
Telecommunications Carrier (ETC) to Receive
Rural Digital Opportunity Fund Auction
(Auction 904) Support for Voice and Broadband
Services.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on June 1, 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. CA8

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: June 1, 2021**

REGULAR CONSENT EFFECTIVE DATE _____ N/A _____

DATE: May 24, 2021

TO: Public Utility Commission

FROM: Bret Farrell

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

SUBJECT: CHARTER FIBERLINK OR-CCVII, LLC:
(Docket No. UM 2149)
Application for Designation As An Eligible Telecommunications Carrier
and Eligible Telecommunications Provider.

STAFF RECOMMENDATION:

Staff recommends the Commission grant the request of Charter Fiberlink OR-CCVII, LLC (Charter Fiberlink) 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 subject to the following conditions:

1. When Charter Fiberlink begins to offer services in any RDOF-awarded census block, the Company will post to its website a link to Oregon-specific Lifeline information. The Oregon-specific web page will include
 - a. A plain language explanation for why Oregon Lifeline is limited to RDOF-awarded census blocks as opposed to the Company's entire service territory, and
 - b. A customer service phone number the customer can call to ascertain whether they reside in any RDOF-awarded census block.
2. Customer support personnel supporting Charter Fiberlink will be trained to understand the distinction between the RDOF and non-RDOF census blocks and to advise customers correctly. Thirty days prior to offering services in any RDOF-awarded census block, Charter Fiberlink will submit to Staff for review and comment the training or reference materials it will provide to Company customer

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service representatives. The training or reference materials will clearly define Oregon Lifeline policies and procedures.

3. Charter Fiberlink will make conspicuous in all Lifeline marketing materials used that Lifeline is available only in select areas.

The designations are prerequisites to Charter Fiberlink's receipt of federal universal service funds associated with its winning bids in the RDOF Auction 904. These funds will enable Charter Fiberlink to deliver gigabit-speed internet access service to 15,139 locations in certain census blocks across the state. ETC and ETP designations will also facilitate the expansion of voice and Lifeline services in those areas.

To ensure that Charter Fiberlink 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 Charter Fiberlink OR-CCVII, LLC 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 UM 1648, Order No. 15-382 entered December 1, 2015 (ETC Order). These are listed in Appendix A to the ETC Order.

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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

Charter Fiberlink is a majority owned and wholly controlled subsidiary of Charter Communications, Inc. ("Charter"). CCO Holdings and Charter Fiberlink are both subsidiaries of Charter. Charter is a broadband connectivity company, which serves more than 30 million customers nationwide. Under the brand name Spectrum, the company offers advanced communications services, including broadband Internet access, cable video, voice, and mobile services. Through its subsidiaries, Charter provides these services in 41 states, including to approximately 257,000 customers in Oregon. On December 17, 2003, Charter Fiberlink filed an application for certification to provide telecommunications service in Oregon as a competitive provider. The Commission granted Charter Fiberlink's application on January 24, 2004 in Order 04-049.¹

The Current Application

On January, 6 2021, Charter Fiberlink filed the application at issue here. The company requests designation as a federal ETC and ETP to enable it to receive over \$33.5 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 Charter Fiberlink bring Fiber-to-the-Home service to 15,139 locations in the specific census blocks listed in Attachment A. These census blocks are located in rural areas across the state. As part of the ETC designation for high-cost funds, Charter Fiberlink is obligated to offer Lifeline services in the same areas. ETP designation, which is also required, will enable Charter Fiberlink to participate in the OTAP program and offer supplemental support to qualifying low-income consumers.

Charter Fiberlink participated in the RDOF auction under CCO Holdings LLC, which is a holding company established by Charter for participating in the FCC's Rural Digital Opportunity Fund. The FCC's December 7, 2020 *Auction 904 Results Notice* announced that CCO Holdings was among the winners of the recently concluded RDOF

¹ Order No. 04-049 in CP 1202

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Auction. Specifically, the FCC announced CCO Holdings as a winning bidder in 1,540 Census Blocks in Oregon. In accordance with the FCC's procedures allowing winning bidders to divide and assign their bids to affiliated operating companies within the relevant state, CCO Holdings assigned its winning bid in Oregon to Charter Fiberlink. In order to complete all requirements and begin receiving support, however, Charter Fiberlink must file documentation of its ETC designation from the Oregon Commission by June 7, 2021.²

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 intention was 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. Charter Fiberlink 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, Charter Fiberlink 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 Charter Fiberlink had filed with the FCC following the RDOF auction. This included the "long form application" submitted by winning bidders after the auction.

Charter Fiberlink's application, in conjunction with the information submitted to the FCC, demonstrates that it satisfies the Commission's ETC requirements as discussed below. The following numbers correspond to the application requirement in Appendix A of the ETC Order 15-382.

1. Information regarding applicant and its common carrier status: Charter Fiberlink is a common carrier in Oregon. On December 17, 2003, Charter Fiberlink filed an application for certification to provide telecommunications service in Oregon as a competitive provider. The Commission granted Charter Fiberlink's application on January 24, 2004 in Order 04-049³. Charter Fiberlink intends to deploy a fiber-to-the-home network throughout the RDOF Phase 1-eligible census blocks identified in the company's application. Staff has examined all financial information

² FCC Public Notice DA 20-1422, released December 7, 2020.

³ Order No. 04-049 in CP 1202

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pertaining to the funding and financial health of Charter Fiberlink and finds 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: Charter Fiberlink requests designation to receive federal high-cost support from the RDOF Auction 904, as well as Lifeline support.
3. Commitment and ability to provide all supported services: Charter Fiberlink 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. Charter Fiberlink commits that these services will be provided consistent with applicable high-cost universal service support rules in the RDOF Census Blocks. Charter Fiberlink will also ensure that Lifeline voice and broadband Internet services are offered in accordance with the FCC's rules in all Census Blocks where Charter Fiberlink has been awarded RDOF support. Moreover, for its Lifeline voice service offering, Charter Fiberlink will offer to Lifeline-eligible customers a Charter voice service plan, as described above, at the discounted Lifeline voice service rate in the RDOF Census Blocks. Charter Fiberlink will commence the provision of its voice telephony services upon completion of construction and installation of network facilities in the RDOF Census Blocks in Appendix A. More information about Charter Fiberlink's service offerings can be found at www.spectrum.com/home-phone or www.business.spectrum.com/phone. The terms of the support assigned to Charter Fiberlink under the RDOF Auction will require it to offer Charter's 1 Gbps broadband connections in the RDOF Census Blocks in Oregon. More information about broadband services offered by Charter and its affiliates may be found at www.spectrum.com/internet.
4. Identification and definition of proposed designated service and commitment to serve: Charter Fiberlink 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. Charter Fiberlink 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% of the required

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number of locations in a state by the end of third year of support and an additional 20% by the end of the fourth and fifth years of support.⁴

5. Types of facilities used to provide supported services: Charter is a facilities-based broadband internet access and voice service provider, with its own network, gateways, switching facilities, and other associated facilities. Charter Fiberlink will offer the RDOF supported services using its own facilities within the meaning of the FCC's rules or a combination of its own facilities and resale of another carrier's services within the RDOF Census Blocks. Charter Fiberlink will use the facilities of its parent company, Charter, or a combination of its own facilities and resale of another carrier's services within the RDOF Census Blocks. Charter Fiberlink has current and relevant resale and/or interconnection agreements with the following service providers that operate in the RDOF Census Blocks: CenturyTel of Oregon, United Telephone Northwest (CenturyLink), Qwest, and Ziplly.
6. Commitment to use support in accordance with rules: Charter Fiberlink certifies that, in accordance with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.7(a), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the universal service support is intended. Charter Fiberlink's application includes an affidavit certifying that it will use the support funds only for the intended purposes. Charter Fiberlink 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".⁵ Staff agrees with the FCC's reasoning in this regard. Also, the required buildout targets as described in requirement #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: In the RDOF Census Blocks, Charter Fiberlink affirms will advertise the

⁴ FCC Order 20-5, released February 7, 2020 para. 48.

⁵ FCC Public Notice DA 20-1422 para. 36

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availability of its universal service offerings and charges for such offerings using media of general distribution, and will also publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

8. Commitment to offer and advertise Lifeline and OTAP services: Charter Fiberlink commits to offer Lifeline voice and broadband Internet services and OTAP services in accordance with the FCC and Commission rules in all Census Blocks where Charter Fiberlink has been awarded RDOF support. Charter Fiberlink affirms it will also publicize the availability of Lifeline and OTAP services in a manner reasonably designed to reach those likely to qualify for the service. For its Lifeline and OTAP voice service offerings, Charter Fiberlink will offer to Lifeline eligible customers a Charter interconnected VoIP service plan at the discounted Lifeline voice service rate. Charter's voice service offering includes unlimited long distance calling in the United States, Canada, Puerto Rico, the US Virgin Islands, and Guam. Calling features include voicemail, call waiting, caller ID, call forwarding, and other features, at no additional charge. In addition, the E911 feature automatically provides the emergency service operator with a caller's phone number and location (wherever available from local government or public safety organizations). Upon designation, Charter Fiberlink will participate in the OTAP and comply with all applicable OTAP and RSPF requirements. Charter Fiberlink will comply with the requirements of 47 C.F.R. § 54.401(d) in the RDOF Census Blocks after ETC designation is granted by the Commission.
9. Ability to remain functional in emergencies: Charter Fiberlink commits that it will apply its existing model to remain functional in emergencies to its RDOF services and customers in Oregon. These plans contain activation, staffing, escalation, and communication procedures to identify and respond to emergencies. Additionally, all switching facilities are equipped with independent power generators and sufficient fuel to operate for several days to mitigate commercial power outages. The design of these facilities contains multiple levels of redundancy and autonomy that also mitigate the need for dedicated human interaction. Charter Fiberlink will rely on Charter's existing 911 capabilities. Charter includes an E911 feature automatically with its voice service that provides the emergency service operator with a caller's phone number and location for all of its voice customers. Charter Fiberlink commits to comply with Oregon's 9-1-1 emergency reporting system tax requirements as set forth in ORS 403.200 to ORS 403.230.
10. Commitment to service quality and consumer protection standards: Charter Fiberlink commits to comply with applicable high-cost and RDOF Auction rules,

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as well as all applicable state regulations concerning service quality and consumer protection issues with respect to the voice services offered in the RDOF Census Blocks. Charter Fiberlink commits to resolve customer complaints received by the Commission. Charter Fiberlink has designated William C Wesselman as the designated contact for resolution of customer complaints.

11. Designation on Tribal Lands: These requirements do not apply as Charter Fiberlink is not seeking designation on Tribal Lands.
12. Public interest showing: Designation of Charter Fiberlink as an ETC to receive federal universal service funds is in the public interest. Charter Fiberlink'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. Charter Fiberlink agrees to abide by all ETC annual reporting requirements established by the commission. Charter Fiberlink 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 Charter Fiberlink.

As to ETP requirements, Charter Fiberlink requests ETP designation to participate in the OTAP and offer Lifeline services. In response to ETC requirement #8 above, Charter Fiberlink commits to abide by all OTAP and RSPF rules and procedures.

Staff notes that Charter offers services in Oregon outside the RDOF service area, where Lifeline-supported services are not and will not be available. Staff seeks to avoid confusion for customers as to whether they are located in an area where Lifeline-supported service is available, and thereby reduce the number of associated applications that may be submitted from customers areas where Lifeline is not available.

After conferring with the Company, Staff recommends designation as an ETP subject to the following conditions:

1. When Charter Fiberlink begins to offer services in any RDOF-awarded census block, the Company will post to its website a link to Oregon-specific Lifeline information. The Oregon-specific web page will include:

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- a. A plain language explanation for why Oregon Lifeline is limited to RDOF-awarded census blocks as opposed to the Company's entire service territory, and
 - b. A customer service phone number the customer can call to ascertain whether they reside in any RDOF-awarded census block.
2. Customer support personnel supporting Charter Fiberlink will be trained to understand the distinction between the RDOF and non-RDOF census blocks and to advise customers correctly. Thirty days prior to offering services in any RDOF-awarded census block, Charter Fiberlink will submit to Staff for review and comment the training or reference materials it will provide to Company customer service representatives. The training or reference materials will clearly define Oregon Lifeline policies and procedures.
3. Charter Fiberlink will make conspicuous in all Lifeline marketing materials used that Lifeline is available only in select areas.

No party filed to intervene in the docket.

Conclusion

Staff finds Charter Fiberlink'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 Charter Fiberlink'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 Charter Fiberlink to meet the FCC's deadline to receive funding.

PROPOSED COMMISSION MOTION:

Approve the request of Charter Fiberlink OR-CCVII, LLC 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, subject to the following conditions:

1. When Charter Fiberlink begins to offer services in any RDOF-awarded census block, the Company will post to its website a link to Oregon-specific Lifeline information. The Oregon-specific web page will include:

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- a. A plain language explanation for why Oregon Lifeline is limited to RDOF-awarded census blocks as opposed to the Company's entire service territory, and
 - b. A customer service phone number the customer can call to ascertain whether they reside in any RDOF-awarded census block.
2. Customer support personnel supporting Charter Fiberlink will be trained to understand the distinction between the RDOF and non-RDOF census blocks and to advise customers correctly. Thirty days prior to offering services in any RDOF-awarded census block, Charter Fiberlink will submit to Staff for review and comment the training or reference materials it will provide to Company customer service representatives. The training or reference materials will clearly define Oregon Lifeline policies and procedures.
3. Charter Fiberlink will make conspicuous in all Lifeline marketing materials used that Lifeline is available only in select areas.

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ATTACHMENT A

Census Blocks

410079504001033	410290014002061	410333608003009
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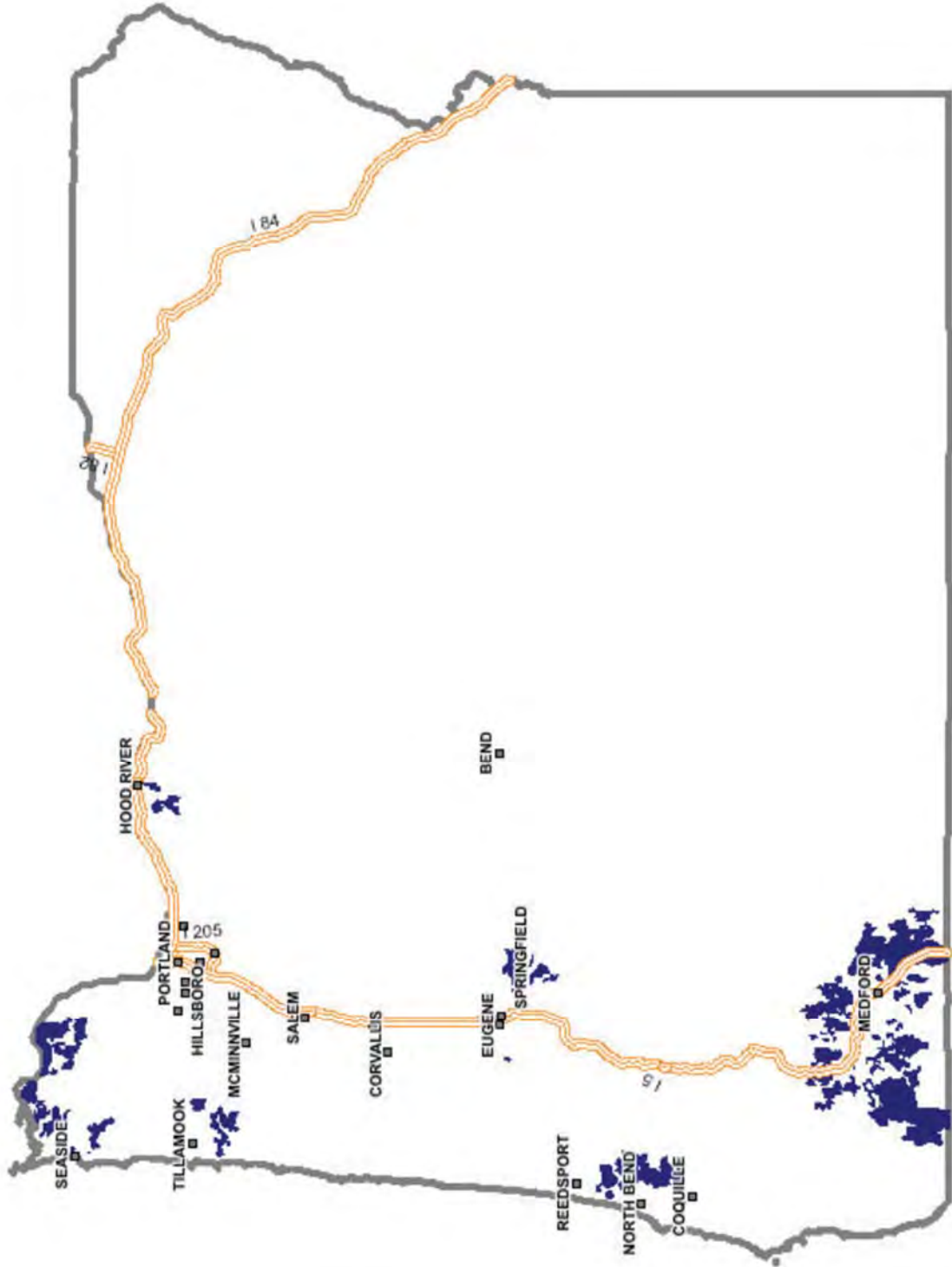
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410290014002042	410333608003008	410579607003109
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