

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of)) CABLE ONE VOIP LLC d/b/a SPARKLIGHT)) for Designation as an Eligible Telecommunications) Carrier in the State of Washington to Receive) Rural Digital Opportunity Fund (Auction 904)) Support for Voice and Broadband Services) <hr style="width: 100%; margin-top: 10px;"/>	Docket No. UT-210167
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**AMENDED APPLICATION
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER TO
RECEIVE RURAL DIGITAL OPPORTUNITY FUND (AUCTION 904) SUPPORT FOR
VOICE AND BROADBAND SERVICES**

Cable One VoIP LLC d/b/a Sparklight (the “Company”) respectfully submits this Amended Application for Designation as an Eligible Telecommunications Carrier (“Application”) to the Washington Utilities and Transportation Commission (“Commission”) pursuant to Section 214(e)(2)¹ of the federal Communications Act of 1934, as amended (the “federal Act”), the rules and regulations of the Federal Communications Commission (“FCC”),² and Washington Administrative Code (“WAC”) 480-123-030. The Company seeks eligible telecommunications carrier (“ETC”) designation from the Commission to receive Rural Digital Opportunity Fund (“RDOF”) support for the provision of voice and broadband services in certain census blocks of Washington (the “Designated Service Area”) as set forth in **Exhibit 1**.³

The Company’s parent, Cable One, Inc. (“Cable One”), was a member of a consortium that

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.201, 54.202; *see also Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021*, 35 FCC Rcd 13888 (2020) (“Public Notice”); *Lifeline and Link Up Reform and Modernization; et al.*, 27 FCC Rcd 6656 (2012) (“Lifeline Reform Order”).

³ Exhibit 1 provides a description of the area for which designation is sought as required by WAC 480-123-030(1)(a). This Application also is verified in accordance with the requirements of WAC 480-123-030(2).

was selected as a winning bidder in the FCC’s RDOF auction (Auction 904). The Company’s receipt of RDOF funding is conditioned upon the Company obtaining designation as an ETC in the census blocks set forth in Exhibit 1, and providing evidence of such designation to the FCC no later than June 7, 2021. For RDOF purposes, the Company is obligated to provide broadband Internet access service at the Gigabit performance level in Washington in accordance with the service milestones and buildout requirements established by the FCC, and also is required to offer the federal Lifeline discount on all qualifying services in the areas in which the Company receives RDOF support.⁴

As demonstrated herein, the Company meets all of the statutory and regulatory requirements for designation as an ETC in the state of Washington. Accordingly, the Company respectfully requests the Commission grant it ETC status in the Designated Service Area on an expedited basis prior to the June 7, 2021 FCC deadline.

In support of this Application, the Company states:

BACKGROUND

1. The Company is a Delaware limited liability company with a principal place of business located at 210 E. Earll Drive, Phoenix, Arizona 85012. The Company registered with the Commission as a competitive telecommunications company in Docket No. UT-210082 to provide interconnected Voice over Internet Protocol (“VoIP”) service. The Company also is registered with the Washington Secretary of State to conduct business in the state as shown in **Exhibit 2** (UBI Number 604 700 931). The Company will operate in Washington under the DBA brand

⁴ *Public Notice at n.72; see also Wireline Competition Bureau Seeks Comment on Petitions for Designation as an Eligible Telecommunications Carrier for the Purpose of Becoming Eligible to Receive Connect America Fund Phase II Auction Support*, 33 FCC Rcd 9764 (2018) (“Recipients of high-cost support, including recipients of CAF support awarded pursuant to Auction 903, must offer the Lifeline discount on all qualifying services in areas where an ETC receives high cost support, deploy a network capable of delivering service that meets the Lifeline program’s minimum service standards, and commercially offer such service pursuant to its high-cost obligation.”).

“Sparklight,” which has been filed with the Commission and with the Washington Department of Revenue as reflected in **Exhibit 3**. Attached as **Exhibit 4** is a current list of the Company’s officers, along with relevant biographical information.

2. The Company currently offers interconnected VoIP service in the state of Arizona. The Company also is registered to provide interconnected VoIP service in the state of Iowa. The Company’s VoIP service registration is pending in Louisiana, and the Company has filed for certification in the state of Nebraska.

3. The Company recently was granted ETC designation in the state of Idaho to receive RDOF and Lifeline-only support. In connection with the RDOF, the Company has ETC applications pending in Arizona, Arkansas, Idaho, Iowa, Louisiana, Minnesota, Nebraska, New Mexico, North Dakota, and Texas. The Company has never been denied ETC designation by any state commission or by the FCC.

4. The Company is a wholly owned subsidiary of Cable One, a publicly traded Delaware corporation (NYSE: CABO), and Cable One serves as the sole member of the Company. Cable One and its subsidiaries provide cable/video, Internet access, broadband, and voice services in 21 states, including Washington. Other subsidiaries of Cable One also hold ETC designation in the states of Illinois, Missouri, and Oklahoma.

5. In January 2020, the FCC adopted the framework and rules for Phase I of the RDOF auction (Auction 904) to connect millions of rural homes and small businesses to fixed high-speed broadband networks.⁵ The FCC designed Phase I of the auction to award up to \$16 billion over 10 years to service providers that commit to offer voice and broadband services to fixed locations

⁵ *Rural Digital Opportunity Fund, et al.*, 35 FCC Rcd 686 (2020) (“RDOF Order”).

in eligible unserved high-cost census blocks. The framework for the RDOF builds upon the FCC's successful Connect America Fund Phase II (CAF-II) auction that was completed in 2018.⁶

6. The Company's parent, Cable One, participated in Auction 904 as a member of the Wisper-CABO 904 Consortium (the "Consortium"). On December 7, 2020, the FCC issued the *Public Notice* announcing the results of Auction 904, and the Consortium was the winning bidder in numerous states, including Washington.⁷ Pursuant to the FCC's process for distributing winning bids among related entities,⁸ the Consortium assigned the winning bids in the state of Washington to the Company to receive RDOF support. The Company also has been designated as the entity in the long-form application (FCC Form 683) filed with the FCC to fulfill the public interest obligations associated with receiving RDOF support for Washington. A copy of the Company's FCC Form 683 is set forth in **CONFIDENTIAL Exhibit 5**, and is being submitted pursuant a request for **CONFIDENTIAL TREATMENT** pursuant to WAC 480-07-160. The FCC has not yet released the FCC Form 683 to the public. Accordingly, the Company requests that the FCC Form 683 remain confidential until released by the FCC for public comment (and then, only those portions of the FCC Form 683 that are publicly released by the FCC should be made public in Washington).

7. In addition to announcing the winning bidders, the FCC's *Public Notice* also established several deadlines in connection with Auction 904. The FCC requires the Company to provide documentation to the FCC no later than 6:00pm Eastern on June 7, 2021 showing the Company has been designated as a high-cost ETC for the census blocks for which the Company

⁶ The Commission conducted several ETC designation proceedings in connection with the CAF-II auction. *See, e.g.*, Docket Nos. UT-180810, UT-180890, UT-180839, and UT-180763.

⁷ *Public Notice*, Attachment A at 29-30.

⁸ *Public Notice* ¶¶ 9-14.

will receive RDOF support.⁹ An officer of the Company also is required to certify to the FCC that the ETC designation covers all of the census blocks for which the Company will receive RDOF support.

8. Pleadings, orders, notices, and other correspondence filed in this matter should be served upon:

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202-862-8900 (telephone)
212-269-5420 (facsimile)
ckiser@cahill.com
acollins@cahill.com

The above-referenced individuals agree to receive all Commission notices and orders regarding this proceeding via electronic mail.

**INFORMATION REQUIRED UNDER COMMISSION AND
FCC RULES FOR ETC DESIGNATION**

9. Section 214(e)(1) of the federal Act, the FCC’s rules, and WAC 480-123-030 set forth certain requirements for ETC designation.¹⁰ The Commission “will approve a petition for designation as an ETC if the petition meets the requirements of WAC 480-123-030, the designation will advance some or all of the purposes of universal service found in 47 U.S.C. § 254, and the designation is in the public interest.”¹¹ The Company meets each of these requirements.

10. FCC Rule 54.201(c); FCC Rule 54.202(b). An ETC applicant must demonstrate the ETC designation is consistent with the public interest, convenience, and necessity, and in the

⁹ *Public Notice* ¶ 17.

¹⁰ 47 U.S.C. § 214(e)(1); 47 C.F.R. §§ 54.201, 54.202; WAC 480-123-030.

¹¹ WAC 480-123-040.

case of an area served by a rural telephone company, demonstrate the public interest will be met by an additional designation.

11. Designation of the Company as an ETC will serve the public interest, convenience, and necessity. ETC designation will permit the Company to use RDOF support to offer voice and broadband services to unserved, high-cost areas of Washington. The Company will invest in facilities and equipment in the Designated Service Area. The planned investment and deployment in the Designated Service Area will further the goals of the Commission and the FCC by expanding the reach of digital connectivity to promote economic growth in rural areas and ensure quality communications services are available at “just, reasonable, and affordable rates.”¹² As the FCC has observed, “an important goal of the [federal] Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”¹³

12. FCC Rule 54.201(d). An ETC applicant must be a “common carrier” as defined by federal law.¹⁴ The Company will provide broadband Internet access service and voice service in the Designated Service Area. The Company will provide voice service as interconnected VoIP service in Washington. As to customers and locations in which the Company is awarded RDOF support, the Company will provide its voice service on a common carrier basis.

13. FCC Rule 54.201(d)(1); FCC Rule 54.201(i); WAC 480-123-030(1)(b). An ETC applicant must demonstrate that it is capable of providing and will continuously provide the supported services throughout the service area either by using its own facilities or a combination

¹² 47 U.S.C. § 254(b)(1).

¹³ *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

¹⁴ 47 U.S.C. § 153(11).

of its own facilities and the resale of another carrier's services. The Company certifies it will offer the services that are supported by the federal universal service support mechanisms in the Designated Service Area using a combination of its own facilities and the facilities of other providers.

14. Two services are supported by the federal universal service support mechanisms: (1) voice telephony services; and (2) broadband Internet access services.¹⁵ Eligible voice telephony services must provide voice grade access to the public switched telephone network ("PSTN") or its functional equivalent, minutes of use for local service provided at no additional charge, access to emergency 911 and enhanced 911 service in locations where implemented, and for qualifying low-income consumers, toll limitation service.¹⁶ Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.¹⁷

15. The Company certifies that it will offer voice and broadband services in the Designated Service Area that satisfy the FCC's requirements. The Company's voice offering will provide voice grade access to the PSTN, and will include unlimited local calling. In addition, the Company's voice offering will provide consumers with access to 911 and enhanced 911 to the extent local governments have implemented such services. The FCC eliminated the requirement to provide toll limitation services if a Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.¹⁸ As explained below, the Company will provide

¹⁵ 47 C.F.R. § 54.101.

¹⁶ 47 C.F.R. § 54.101(a)(1).

¹⁷ 47 C.F.R. § 54.400(l).

¹⁸ *Lifeline Reform Order* ¶ 49.

toll limitation service to Lifeline customers if the Lifeline customer chooses a standalone voice plan that does not include unlimited voice calling within the United States.

16. Similarly, the Company's broadband Internet access service offering will provide consumers with the capability to transmit data to and receive data from all or substantially all Internet endpoints. The Company's broadband Internet access service offering will meet the minimum service standards required by the FCC's rules,¹⁹ and for the receipt of RDOF funding.²⁰ To meet its RDOF obligations at the Gigabit level, the Company plans to offer a broadband Internet access service plan providing at least 1 Gbps/500 Mbps with at least 2 TB monthly usage in accordance with the service milestones established by the FCC.

17. The Company will use a combination of its own facilities and the facilities of other providers to offer the supported services in the Designated Service Area. The Company will provide the supported services using the existing facilities-based network of its parent Cable One, as well as new network facilities to be deployed, including a combination of aerial and underground facilities to create a fixed, facilities-based network capable of offering the supported services in the Designated Service Area. Under FCC rules, facilities are the ETC's "own" if the ETC has exclusive right to use the facilities to provide the supported services or when service is provided by any affiliate within the holding company structure.²¹

18. FCC Rule 54.201(d)(2); FCC Rule 54.405(b)-(d); WAC 480-123-030(1)(e). An ETC applicant must demonstrate that it will advertise the availability of its offering and service charges using media of general distribution. The Company will publicize the availability of its

¹⁹ 47 C.F.R. § 54.408.

²⁰ *RDOF Order* ¶¶ 31, 33.

²¹ *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, 33 FCC Rcd 6696, nn. 23-24 (2018).

voice and broadband service offerings throughout the Designated Service Area using media of general distribution.²² The Company will use a combination of digital and traditional media, such as the Internet, outbound email, outdoor advertising, radio advertising, newspaper and magazine advertising, and direct marketing materials. The Company also will rely on the marketing practices and advertising expertise of Cable One to advertise the availability of its service offerings in the Designated Service Area.

19. In addition, with respect to Lifeline services, the Company will publicize the availability of the Lifeline discount in the Designated Service Area in a manner reasonably designed to reach those likely to qualify for the service.²³ Using easily understood language, the Company will indicate on all materials describing Lifeline that: (1) it is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; and (5) the program is limited to one discount per household.²⁴ The Company also will disclose its name or its DBA name on all materials describing the Lifeline service.²⁵

20. FCC Rule 54.201(h); FCC Rule 54.202(a)(4). An ETC applicant must demonstrate it is financially and technically capable of providing Lifeline service in compliance with the FCC's rules. The FCC has stated that the "relevant considerations" for satisfying this requirement are whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal

²² 47 C.F.R. § 54.201(d)(2).

²³ 47 C.F.R. § 54.405(b).

²⁴ 47 C.F.R. § 54.405(c). For these purposes, the term "materials describing the service" includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms. *See id.*

²⁵ 47 C.F.R. § 54.405(d).

service fund disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.²⁶

21. The Company is financially and technically capable of offering Lifeline services in the Designated Service Area. The Company's parent and affiliates have been offering services in Washington and several other states for many years. Cable One also can provide the Company with additional financial and technical support as needed, and the Company will utilize the same management and day-to-day operational personnel.²⁷ The Company currently provides non-Lifeline voice services in Arizona; it will not rely exclusively on universal service fund disbursements to operate. Finally, the Company has not been subject to enforcement action or ETC revocation proceedings in any state.

22. FCC Rule 54.202(a)(1); WAC 480-123-030(1)(c); WAC 480-123-030(1)(d). An ETC applicant must certify that it will comply with the service requirements applicable to the support it receives, and submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. In addition, under the Commission's rules, an ETC applicant must provide a description of how it will provide each supported service, a substantive plan of the investments to be made with initial federal support during the first two years in which support is received, and a substantive description of how those expenditures will benefit customers.²⁸

23. The Company certifies that it will comply with the service requirements applicable

²⁶ *Lifeline Reform Order* ¶ 388.

²⁷ The Company's financial reporting is consolidated with its parent Cable One. Financial information concerning Cable One can be found at: <https://ir.cableone.net/corporate-profile/default.aspx>.

²⁸ A description of how the Company's services will benefit customers is set forth above in the discussion regarding the how the Company's designation as an ETC meets the public interest.

to RDOF support in the Designated Service Area. The Company notes it must meet certain service milestones and buildout requirements in the Designated Service Area as a condition of receiving RDOF support.²⁹ Further, the Company will submit the required detailed information to the FCC regarding the Company's intended technology and system design for the provision of RDOF-funded services in the Designated Service Area, including network diagrams certified by a professional engineer.³⁰ Some of this information can be found in **CONFIDENTIAL Exhibit 5**, including information regarding the investment and associated buildout to be completed by the Company in the Designated Service Area.³¹

24. As noted above, the Company will provide the supported services using the existing facilities-based network of its parent Cable One, as well as new network facilities to be deployed. The Company will extend the existing Cable One hybrid fiber coax facilities to serve the census blocks in the Designated Service Area that are adjacent to the existing Cable One network. The Company will deploy fiber-to-the-home ("FTTH"), which will be connected to the existing Cable One network via the addition of middle mile fiber optic construction, to serve the census blocks in the Designated Service Area that are outside of the existing Cable One network.

25. The FCC has waived the requirement for a winning bidder in Auction 904 to file a five-year network improvement plan as part of the ETC designation process.³² As an RDOF recipient, the Company is subject to rigorous deployment milestones and penalties for non-

²⁹ *RDOF Order* ¶ 45. For purposes of meeting the FCC's service milestones, a RDOF recipient will be deemed to be commercially offering voice and/or broadband service to a location if it provides service to the location or could provide service to the location within 10 business days upon request. *See id.* ¶ 54.

³⁰ *Public Notice* ¶¶ 16-17.

³¹ *See Exhibit 5, Initial Project Overview Attachment, Technology and System Design Description, and Washington Project Plan & Design Maps.*

³² *Public Notice* at n.71 (applying the same waivers previously applied to ETC designations for the CAF-II auction to ETC designations for Auction 904).

compliance, which ensure RDOF-supported services are timely delivered to customers. Accordingly, the Company respectfully requests a waiver of the Commission's requirement to submit a two-year investment plan.

26. FCC Rule 54.202(a)(2); WAC 480-123-030(1)(g). An ETC applicant must demonstrate that it can remain functional in emergency situations. The Company certifies it will have the ability to remain functional in emergency situations in the Designated Service Area. The Company has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. In addition, as a subsidiary of Cable One, the Company will be able to rely on Cable One's disaster recovery contingency plans such as the use of diverse/alternate routing, electronics redundancy, redundant data centers, geographically separated operations, and environmental controls for data and switching centers to remain functional in an emergency situation. Cable One maintains geo-diverse data centers, which house back office and customer support systems. Cable One's network interconnects with transit and peering organizations at six geo-redundant locations across the United States, which makes the network highly redundant and provides full failover capacity should any site become unavailable.

27. Further, as a provider of interconnected VoIP service, the Company also is subject to FCC requirements regarding back-up power.³³ Under FCC Rule 9.20, any provider of a facilities-based, fixed voice service offered as residential service that is not line-powered must offer subscribers the option to purchase backup power for the voice service, and must make certain annual disclosures regarding the availability of such backup power options.

³³ 47 C.F.R. § 9.20.

28. FCC Rule 54.202(a)(3); WAC 480-123-030(1)(h). An ETC applicant must certify that it will comply with all applicable service quality standards and consumer protection rules. The FCC, however, has waived the requirement for a winning bidder in Auction 904 to demonstrate that it will satisfy consumer protection and service quality standards as part of the ETC designation process.³⁴ The Company certifies that it will comply with service quality standards and consumer protection rules applicable to its provision of service in the Designated Service Area. Cable One and its subsidiaries, including the Company, have a long history of offering service in Washington and many other states.³⁵ The Company commits to abide by all applicable consumer protection and service quality standards of Chapter 480-120 to the extent applicable to the services provided by the Company in the Designated Service Area.

29. FCC Rule 54.202(a)(5); FCC Rule 54.202(a)(6). FCC rules require ETC applicants to provide information describing the terms and conditions of voice telephony service and broadband Internet access service plans to be offered to Lifeline subscribers. For Lifeline services, the FCC has determined that providers may satisfy the obligation to provide local usage via service offerings that bundle local and long distance minutes.³⁶

30. At this time, the Company plans to offer service plans that include high-speed Internet access service and unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area. The Company also will offer standalone voice services as required by the FCC.³⁷ To meet its RDOF obligations at the Gigabit level, the Company plans to

³⁴ *Public Notice* at n.71 (applying the same waivers previously applied to ETC designations for the CAF-II auction to ETC designations for Auction 904).

³⁵ *See, e.g.,* Cable ONE Captures Top Spot in the West in J.D. Power Residential Internet Satisfaction Study (Oct. 31, 2018), <https://www.businesswire.com/news/home/20181031005045/en/Cable-ONE-Captures-Top-Spot-in-the-West-in-J.D.-Power-Residential-Internet-Satisfaction-Study>

³⁶ *Lifeline Reform Order* ¶ 49.

³⁷ *RDOF Order* ¶ 42.

offer a broadband Internet access service plan providing at least 1 Gbps/500 Mbps with at least 2 TB monthly usage in accordance with the service milestones established by the FCC. The service plan information in Exhibit 6 provides information on the service plans the Company will offer in the Designated Service Area.

31. The Company's pricing will be reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements.³⁸ By way of example, the FCC's 2021 urban average monthly rate is \$33.73, and the reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.75.³⁹ Accordingly, each ETC providing fixed voice service must certify to the FCC in July 2021 that the pricing of its basic residential voice services is no more than \$54.75. The FCC has adopted similar benchmarks for broadband Internet access service, which vary based on the speed and usage allowance.⁴⁰

32. FCC Rule 54.405(a). An ETC must make Lifeline service available to qualifying low-income consumers. The Company certifies that its Lifeline service offering will conform to the definition of "Lifeline" in the FCC's rules.⁴¹

33. FCC Rule 54.405(e). An ETC must implement certain de-enrollment procedures for Lifeline customers. The Company certifies it will comply with the FCC's de-enrollment procedures and will have general de-enrollment procedures in place for Lifeline services. In accordance with FCC requirements, the Company will de-enroll Lifeline customers for no longer qualifying for Lifeline service, for duplicative support, for non-usage, for failure to re-certify, and

³⁸ *RDOF Order* ¶ 42.

³⁹ *Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers*, 35 FCC Rcd 13667 (2020) ("Comparability PN").

⁴⁰ *Comparability PN* at 3.

⁴¹ 47 C.F.R. § 54.401(a).

when requested by the Lifeline customer.

34. FCC Rule 54.409; FCC Rule 54.410. The Company certifies that it will verify the eligibility of its Lifeline subscriber base in accordance with FCC rules using the Lifeline National Verifier and/or the National Lifeline Accountability Database (“NLAD”) as applicable. The Company also has established processes for ensuring Lifeline services are provided only to eligible customers, including procedures for confirming consumer eligibility, enrolling eligible customers, re-certifying eligibility at regular intervals, and recordkeeping.

35. WAC 480-123-060; WAC 480-123-070. The Company certifies that it will comply with the Commission’s annual reporting and certification requirements applicable to ETCs. Specifically, the Company will certify on an annual basis that the Company: (1) used and in the coming calendar year will use federal high-cost universal service fund support provided to the Company in the State of Washington only for the provision, maintenance and upgrading of the facilities and services for which the support is intended; (2) met substantially the applicable service quality standard and consumer protection rules found in WAC 480-123-030(1)(h); (3) maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g); and (4) publicized the availability of its services in a manner reasonably designed to reach those likely to qualify for service and in a manner which, in the Company’s judgment, included advertisements likely to reach those who are not current customers of the Company within the Designated Service Area.

CONCLUSION

WHEREFORE, for the foregoing reasons, the Company respectfully requests that the Commission designate it as an ETC for the provision of RDOF-supported voice and broadband services in the Designated Service Area on expedited basis to occur prior to June 7, 2021.

Dated: April 21, 2021

Respectfully submitted,

**CABLE ONE VOIP LLC D/B/A
SPARKLIGHT**

/s/ Chérie R. Kiser

Chérie R. Kiser
Angela F. Collins
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202-862-8900 (telephone)
212-269-5420 (facsimile)
ckiser@cahill.com
acollins@cahill.com

Its Attorneys

VERIFICATION

I, Peter N. Witty, hereby state under penalty of perjury under the laws of the State of Washington that I am the Vice President & Secretary of Cable One VoIP LLC d/b/a Sparklight (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing Application was prepared under my direction and supervision; and that the contents of the foregoing Application are true and correct to the best of my knowledge, information, and belief.

Executed this 21st day of April 2021 in Phoenix, Arizona.

A handwritten signature in black ink, appearing to read "Peter N. Witty", written over a horizontal line.

Peter N. Witty
Vice President & Secretary
Cable One VoIP LLC

EXHIBITS

Exhibit 1 Designated Service Area

Exhibit 2 Washington Secretary of State Documentation

Exhibit 3 Washington Department of Revenue Documentation

Exhibit 4 Officers

**CONFIDENTIAL Exhibit 5 FCC Form 683 – Submitted pursuant to request for
CONFIDENTIAL TREATMENT pursuant to WAC
480-07-160**

Exhibit 6 Service Plan Information

EXHIBIT 1

Designated Service Area

RDOF Service Areas

<u>County</u>	<u>Census Blocks</u>
Asotin	530039606002026
Asotin	530039606004013

Maps of Designated Service Area

Purple shows the current franchise areas served by Cable One, Inc. in Washington. Green shows the boundaries of the census blocks awarded in the RDOF auction (Auction 904). Brown shows Tribal lands. There are no Tribal lands in the Designated Service Area.

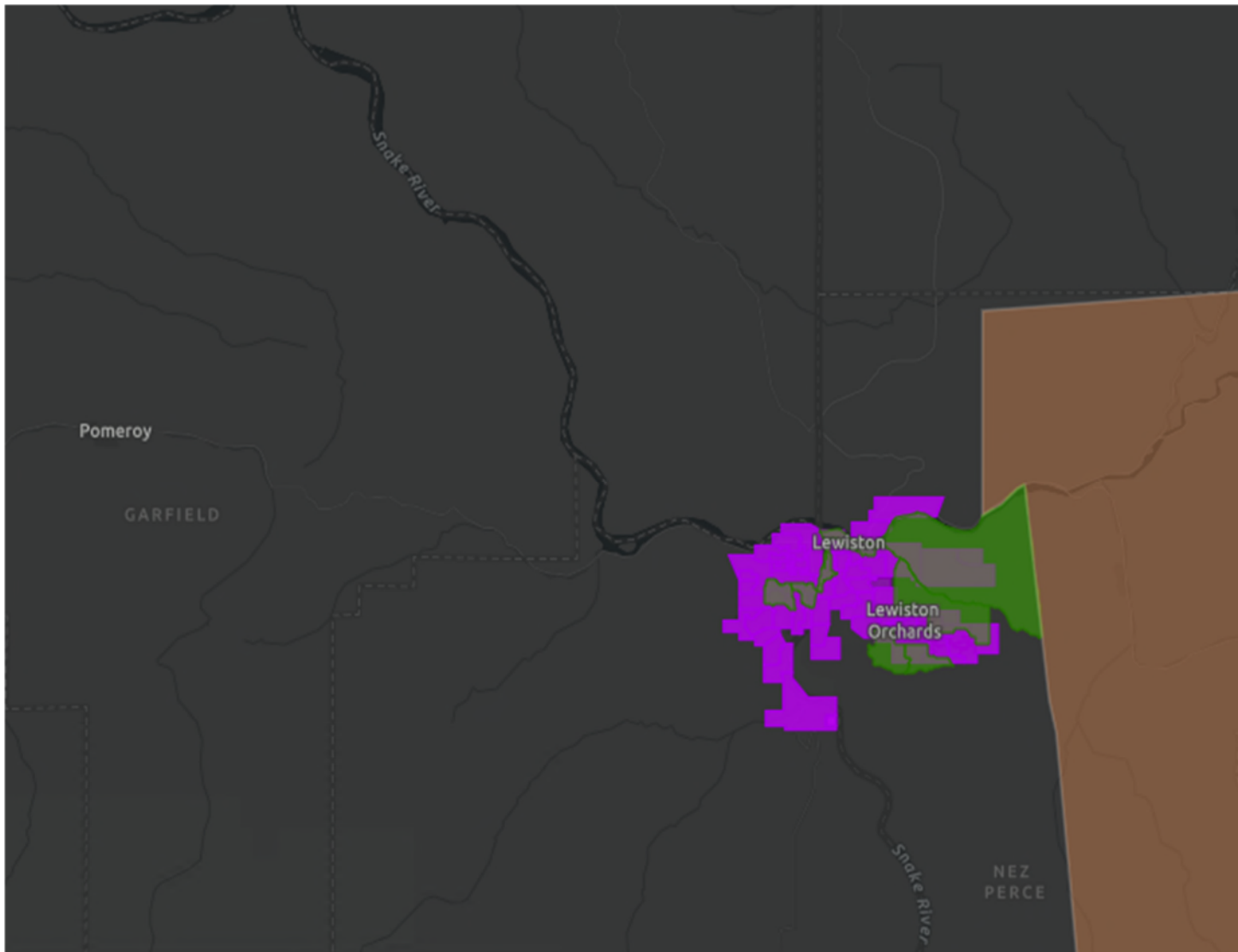


EXHIBIT 2

Washington Secretary of State Documentation

REDACTED VERSION

UNITED STATES OF AMERICA

The State of Washington



Secretary of State

I, **KIM WYMAN**, Secretary of State of the State of Washington and custodian of its seal, hereby issue this

CERTIFICATE OF REGISTRATION

to

CABLE ONE VOIP LLC

A/AN DELAWARE LIMITED LIABILITY COMPANY, effective on the date indicated below.

Effective Date: 01/26/2021
UBI Number: 604 700 931



Given under my hand and the Seal of the State
of Washington at Olympia, the State Capital

Handwritten signature of Kim Wyman in blue ink.

Kim Wyman, Secretary of State

Date Issued: 01/26/2021

EXHIBIT 3

Washington Department of Revenue Documentation



STATE OF WASHINGTON
BUSINESS LICENSING SERVICE

Thank you for filing online

Our processing time generally takes up to 10 business days. Some endorsements may take more time for state or city approval. You will receive your business license with approved endorsements in the mail. An updated business license will be mailed to you when additional endorsements are approved.

Confirmation Number: 0-018-473-109

Filing Date and Time: 02/01/2021 09:26:24 AM

Payment Method: Credit Card ending in 2008
 There is a 2.5% credit card convenience fee charged by a third party vendor.

Business Entity Information

Entity Type: Limited Liability Company
 Name of Entity: CABLE ONE VOIP LLC
 UBI: 604700931

Business Location Information

Firm Name: SPARKLIGHT
 Phone Number: (602) 364-6000
 Fax Number: None
 Location Address: 210 E EARLL DR PHOENIX AZ 85012-2626
 Mailing Address: 210 E EARLL DR PHOENIX AZ 85012-2626

Trade Names Added

SPARKLIGHT

Governing Person

CABLE ONE, INC.,.

Endorsement(s) Applied For	Begin	End	Count	Fee
Tax Registration	02/01/2021		1	\$0.00
				\$0.00

Fee Type	Begin	End	Count	Fee
Trade Name Registration	02/01/2021		1	\$5.00
BLS Processing Fee	02/01/2021		1	\$90.00
				\$95.00

Third Party Credit Card Fee \$2.38

Grand Total: \$97.38

EXHIBIT 4

Officers of Cable One VoIP LLC d/b/a Sparklight

As of January 1, 2021, the following are the officers of Cable One VoIP LLC d/b/a Sparklight:

Julia M. Laulis, President & Chief Executive Officer

Laulis joined Cable One in 1999 as Director of Marketing-NW Division. In 2001, she was named Vice President of Operations for the SW Division. In 2004, she became responsible for starting Cable One's Phoenix Customer Care Center. Laulis was named Chief Operations Officer in 2008, responsible for the company's three operation divisions and two call centers. In 2012, Laulis was named Chief Operating Officer, adding sales, marketing, and technology to her responsibilities. In 2015, Laulis was promoted to President and Chief Operating Officer of Cable One. In 2017, she was named President and Chief Executive Officer and in 2018 she was named Chair of the Board. Prior to joining Cable One, Laulis was with Jones Communications in the Washington, DC area and Denver, where she served in various marketing management positions. Laulis began her 35-year career in the cable industry with Hauser Communications. Laulis graduated from Indiana University in Bloomington with a bachelor's degree in Telecommunications. She attended the Woman in Cable Television Betsy Magness Leadership Institute in 1998/1999 and graduated from the Program for Management Development at the Harvard Business School in 2002. Cable FAX Magazine has named Laulis one of the Most Powerful Women in Cable for the past 10 years running. Laulis currently serves on the boards of The AES Corporation, CableLabs, The Cable Center, and C-SPAN and is a trustee of the C-SPAN Education Foundation.

Michael E. Bowker, Vice President

Mike Bowker is Chief Operating Officer for Cable One. He is responsible for overseeing Cable One's daily operations, technology, and residential and business channels. Bowker joined Cable One in 1999 as Advertising Regional Sales Manager. He is a member of the team that successfully launched the commercial sales division and the residential inbound sales call center. Bowker has been a Vice President of Cable One since 2005. He was named Vice President of Sales in 2012 and was promoted to Senior Vice President, Chief Sales and Marketing Officer in 2014. Prior to joining Cable One, Bowker was with AT&T Media Services and TCI Cable, where he served in various sales management positions. A native of Boise, Idaho, Bowker holds a bachelor's degree in Communication from Boise State University and is a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Bowker currently serves as Vice Chairman of ACA — America's Communications Association.

Steven S. Cochran, Vice President

Steven Cochran is Senior Vice President and Chief Financial Officer at Cable One. He is responsible for the areas of accounting, reporting, finance, and investor relations. A veteran of the cable industry, Cochran spent 15 years at Wide Open West (WOW), a Denver-based cable operator. During his tenure at WOW, Cochran held positions of increasing responsibility, including Chief Financial Officer, Chief Operating Officer, and President and Chief Executive Officer. Prior to WOW, Cochran was Senior Vice President and Chief Financial Officer at Millennium Digital Media. Cochran holds a master's degree in accounting science and a bachelor's degree in economics from the University of Illinois—Urbana Champaign

Jarrold L. Head, Vice President

Jarrold Head is Vice President of Engineering and Construction for Cable One. He is responsible for outside plant engineering, design and construction. Before joining Cable One, Head served as Vice President of Engineering & Technical Operations for Fidelity Communications and its subsidiaries. Prior to that position, he served as Engineering Director for Fidelity, overseeing Engineering and Network Operation teams to design, implement and support Fidelity's advanced technology services. Head holds a bachelor's degree in Electrical Engineering from Missouri University of Science and Technology.

Kenneth E. Johnson, Vice President

Ken Johnson is Senior Vice President of Technology Services at Cable One. He is responsible for the strategic evolution of technology roadmaps related to products, as well as Information Technology, and Network & Engineering. Before joining Cable One, Johnson served as Chief Operating Officer and Chief Technology Officer for NewWave Communications. Prior to NewWave, Johnson was Chief Technology Officer for SureWest Communications and Everest Connections. Originally from Lenexa, Kansas, Johnson holds a bachelor's degree in Computer and Information Sciences from Friends University. Johnson currently serves on the board of the National Cable Television Cooperative.

Eric M. Lardy, Vice President & Assistant Secretary

Eric Lardy is Senior Vice President of Operations and Integration for Cable One. He is responsible for overseeing the company's day-to-day operations, acquisition integration and long-term strategic operating plans. A more than 20-year veteran in the cable industry, Lardy joined Cable One as a Pay-Per-View Manager in the Fargo, North Dakota cable system. He was later promoted to Internet Business Manager, launching dial-up and high-speed broadband services. Lardy relocated several times and held a variety of positions in Marketing, Operations, and system General Management before being promoted to Director of New Products and Service Projects in 2012. In 2014, he was named Vice President of Strategy and Finance. In 2017, he was promoted to Senior Vice President, adding oversight of human resources and business intelligence to his responsibilities. Lardy holds bachelor's degrees in Marketing and International Business from Minnesota State University and an MBA from Arizona State University.

Raymond L. Storck, Jr., Vice President & Treasurer

Ray Storck is Vice President of Finance and Treasurer for Cable One. He is responsible for all of the company's accounting functions. Before joining Cable One, Storck served as Controller at Kona Grill. Prior to that, Storck was Vice President/Controller and then Chief Financial Officer for MicroAge. Following MicroAge, Storck spent 4 years at PetSmart where he served as Vice President/Controller and then Vice President of Finance and Chief Accounting Officer. A native of Iowa, Storck holds a bachelor's degree in Accounting from the University of Northern Iowa.

Peter N. Witty, Vice President & Secretary

Peter N. Witty is Senior Vice President, General Counsel and Secretary for Cable One. He is responsible for overseeing the company's legal, regulatory and compliance functions. Witty has more than 20 years of legal experience. Before joining Cable One, he served as General Counsel and Secretary for Gas Technology Institute (GTI), a leading energy research, development and training organization. Prior to GTI, Witty spent 10 years with Abbott Laboratories, serving in various positions, including as Senior Counsel and Division Counsel. Witty also previously practiced law as an associate at Latham & Watkins LLP and Ross & Hardies (now McGuireWoods LLP). Witty holds a Juris Doctor from Notre Dame Law School and a bachelor's degree in aerospace engineering from the University of Notre Dame. He is also a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Prior to attending law school, Witty was an officer and helicopter pilot in the 101st Airborne Division (Air Assault), where he served during Operations Desert Shield/Desert Storm.

Additional information on the officers and directors of the Company's parent, Cable One, Inc., can be found at: <https://ir.cableone.net/corporate-information/officers-directors/default.aspx>.

EXHIBIT 5

FCC Form 683

**Submitted pursuant to request for
CONFIDENTIAL TREATMENT
pursuant to WAC 480-07-160**

EXHIBIT 6

Service Plan Information

The Company plans to offer the following standalone voice plans in the Designated Service Area pursuant to its ETC designation:

- Voice Plan 1 - \$20 per month: includes unlimited local calling, long distance calls within the continental U.S. for \$0.10/minute, and 3 features (900 Call Block, Call Trace, and Dial Block).
- Voice Plan 2 - \$50 per month: includes unlimited local calling and long distance calls within the continental U.S. and 13 features (900 Call Block, Call Trace, Dial Block, Call Waiting, Call Forwarding, 3-Way Calling, Call Return, Anonymous Call Rejection, Caller ID Block, Selective Call Acceptance, Selective Call Rejection, Selective Call Forward, and Speed Dial).
- Individual features such as Caller ID, Voice Mail, Voice Mail to Email, and Voice Mail Prompts in Spanish are \$7 per month.

A Lifeline-eligible customer subscribing to Voice Plan 1 above also would be offered toll limitation service at no charge.

The Company plans to offer the following broadband Internet access service plans in the Designated Service Area pursuant to its ETC designation:

- Lite 15 Plus - \$30 per month, 15 Mbps/1 Mbps, 100GB usage
- Starter 100 Plus - \$55 per month, 100 Mbps/10 Mbps, 350 GB usage
- Streamer & Gamer 200 Plus - \$65 per month, 200 Mbps/20 Mbps, 700 GB usage
- Turbo 300 Plus - \$80 per month, 300 Mbps/30 Mbps, 1200 GB usage
- GigaOne Plus - \$125 per month, 1000 Mbps/50 Mbps, 1500 GB usage

To meet its RDOF obligations at the Gigabit level, the Company plans to offer the following broadband Internet access service plan in the RDOF-supported areas of Washington in accordance with the service milestones established by the FCC for RDOF support:

- Internet plan offering at least 1 Gbps/500 Mbps with at least 2 TB monthly usage (pricing to be determined, but subject to the FCC's reasonable comparability standards for broadband Internet access services)

The Company plans to offer the following bundled plans in the Designated Service Area pursuant to its ETC designation:

- Starter 100 Plus with voice - \$80.00 per month, 100 Mbps/10 Mbps, 350 GB usage
- Streamer & Gamer Plus with voice - \$90.00 per month, 200 Mbps/20 Mbps, 700 GB usage
- Turbo 300 Plus with voice - \$105.00 per month, 300 Mbps/20 Mbps, 1200 GB usage

The voice plan included in the bundled package is Voice Plan 2 above.

Pursuant to the FCC's current minimum service standard requirements, the Lifeline discount could be applied to the following broadband Internet access service or bundled service plans:

- Turbo 300 Plus - \$80 per month, 300 Mbps/30 Mbps, 1200 GB usage
- GigaOne Plus - \$125 per month, 1000 Mbps/50 Mbps, 1500 GB usage
- Turbo 300 Plus with voice - \$105.00 per month, 300 Mbps/20 Mbps, 1200 GB usage (Voice Plan 2 above)
- RDOF Internet access service plan