

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Application of)
)
CABLE ONE VOIP LLC d/b/a SPARKLIGHT) Docket No. _____
)
for Expansion of Eligible Telecommunications)
Carrier Designation in the State of Washington)
to Receive Federal Lifeline Support)
_____)

**APPLICATION FOR EXPANSION OF ELIGIBLE TELECOMMUNICATIONS
CARRIER DESIGNATION TO RECEIVE FEDERAL LIFELINE SUPPORT**

Cable One VoIP LLC d/b/a Sparklight (the “Company”) respectfully submits this Application for Expansion of Eligible Telecommunications Carrier Designation to Receive Federal Lifeline Support (“Application”) to the Washington Utilities and Transportation Commission (the “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 to expand its existing eligible telecommunications carrier (“ETC”) designation to include the provision of broadband Internet access and voice services in the cable franchise areas currently served by its parent, Cable One, Inc. (“Cable One”), in Washington as set forth in **Exhibit 1** (the “Designated Service Area”).³

The Company’s parent, Cable One, is a participant in the FCC’s Emergency Broadband Benefit (“EBB”) Program pursuant to which eligible low-income households in Washington may

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.201, 54.202; *Lifeline and Link Up Reform and Modernization; et al.*, 27 FCC Rcd 6656 (2012) (“*Lifeline Reform Order*”).

³ This Application is verified in accordance with the requirements of WAC 480-123-030(2).

receive a discount off the cost of broadband Internet access service (or voice/Internet access bundles).⁴ The EBB Program, however, is only a temporary, emergency program, and will come to an end once the funds appropriated by Congress have been expended or six months after the Department of Health and Human Services declares the end of the COVID-19 health emergency, whichever comes first. Recognizing the finite nature of the EBB Program, the FCC has encouraged providers to assist consumers with the transition to comparable broadband services or continue to offer the same broadband service at a discounted rate after conclusion of the EBB Program.⁵ To that end, the Company seeks to expand its ETC designation to ensure low-income Washington consumers can continue to receive discounted broadband Internet access service (or voice/Internet bundles) after the conclusion of the EBB Program. Accordingly, the Company respectfully requests expedited review of this Application to ensure low-income Washington consumers can continue to access “the broadband they need to participate in virtual learning, complete their homework, and communicate with employers and healthcare providers” once the EBB Program ends.⁶

As demonstrated herein, the Company meets all of the statutory and regulatory requirements for designation as a Lifeline-only ETC in the state of Washington. 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

⁴ WC Docket No. 20-445, *Emergency Broadband Benefit Program*, Report and Order, FCC 21-29 (rel. Feb. 26, 2021) (“*EBB Order*”). Additional information regarding the FCC’s EBB Program can be found at: <https://www.fcc.gov/emergency-broadband-benefit-program>.

⁵ *EBB Order* ¶¶ 130-31.

⁶ *EBB Order* ¶ 130.

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 “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 with the Louisiana Public Service Commission and Iowa Utilities Board to provide interconnected VoIP service, and holds certification in the state of Nebraska.

3. The Company was a winning bidder in the FCC’s Rural Digital Opportunity Fund (“RDOF”) auction,⁷ and recently received ETC designation from the Commission for the census blocks for which it was the winning bidder in the RDOF auction.⁸ In connection with RDOF, the Company also has received ETC designation in Arizona, Arkansas, Idaho, Iowa, Louisiana, Minnesota, Nebraska, New Mexico, North Dakota, and Texas (and those designations also include Lifeline-only ETC designation in non-RDOF areas). The Company also has Lifeline-only ETC applications pending at the FCC for the states of Alabama and Tennessee, and plans to file additional Lifeline-only ETC applications in other states to continue serving low-income customers after conclusion of the EBB Program. The Company has never been denied ETC designation by any state commission or by the FCC.

⁷ *Rural Digital Opportunity Fund, et al.*, 35 FCC Rcd 686 (2020) (“*RDOF Order*”). The Company’s parent, Cable One, was a member of the Wisper-CABO 904 Consortium.

⁸ Docket No. UT-210167.

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 24 states, including Washington. Other subsidiaries of Cable One hold ETC designation in the states of Georgia, Illinois, Missouri, Oklahoma, and South Carolina.

5. 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**

6. Section 214(e)(1) of the federal Act, the FCC’s rules, and WAC 480-123-030 set forth certain requirements for ETC designation.⁹ 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.”¹⁰ The Company meets each of these requirements.

7. WAC 480-123-030(1)(a). The Company’s proposed Designated Service Area for

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

¹⁰ WAC 480-123-040.

Lifeline-only service is set forth in **Exhibit 1**, which includes a map of the proposed Designated Service Area (which also includes the Company's RDOF service area for reference). The Designated Service Area for Lifeline-only purposes consists of the cable franchise areas served by Cable One (the Company's parent) in Washington.

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

9. Designation of the Company as an ETC will serve the public interest, convenience, and necessity. ETC designation will permit the Company to provide Lifeline services to low-income consumers in Washington, and ensure those consumers can continue to have access to broadband services after conclusion of the EBB Program. The planned 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."¹¹ 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."¹²

10. Further, designation of the Company as a Lifeline-only ETC will have no material impact on the federal Lifeline fund. Lifeline support follows the customer, so a customer taking

¹¹ 47 U.S.C. § 254(b)(1).

¹² *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

Lifeline service from either the Company or another provider will cause the identical amount of impact upon the federal universal service fund. In addition, the Company is uniquely situated to provide the supported services in the Designated Service Area because it is an established provider with a stable and robust network, and is a member of a large family of companies that have been offering service in Washington and other states for many years.

11. FCC Rule 54.201(d). An ETC applicant must be a “common carrier” as defined by federal law.¹³ 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. The Company will provide its voice service on a common carrier basis to Lifeline customers in the Designated Service Area.

12. 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 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.

13. Two services are supported by the federal universal service support mechanisms: (1) voice telephony services; and (2) broadband Internet access services. 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

¹³ 47 U.S.C. § 153(11).

low-income consumers, toll limitation service.¹⁴ 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.¹⁵

14. 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.¹⁶ As explained below, the Company is not required to provide toll limitation service in connection with its Lifeline service offering because the Company plans to offer unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area. If a Lifeline customer chooses a calling plan that does not include unlimited voice calling within the United States, the Company will provide toll limitation service to that customer at no cost.

15. 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 for Lifeline service offerings.¹⁷

¹⁴ 47 C.F.R. § 54.101(a)(1).

¹⁵ 47 C.F.R. § 54.400(l).

¹⁶ *Lifeline Reform Order* ¶ 49.

¹⁷ 47 C.F.R. § 54.408.

16. The Company will use a combination of its own facilities and the facilities of other providers to offer Lifeline service in the Designated Service Area. The Company's parent, Cable One, is a facilities-based cable operator in Washington and has hybrid fiber coax facilities in the franchise areas set forth in **Exhibit 1** to the Application. The Company will provide Lifeline service using the existing facilities-based network of its parent Cable One. The Company also has entered into a contract with a third-party telecommunications carrier to support its provision of interconnected VoIP service in Washington (and other states). Pursuant to that contract, the third-party telecommunications carrier provides all services and functions related to the PSTN. These PSTN-related services and functions include providing access to 911/E911, as well as obtaining telephone numbers for use by the Company's customers, converting interconnected VoIP service calls into the appropriate format for PSTN transmission, establishing relationships with other telecommunications companies, maintaining necessary communications transmission facilities, and transmitting interconnected VoIP calls to and from the PSTN as needed. 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.¹⁸

17. 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 voice and broadband service offerings throughout the Designated Service Area using media of general distribution.¹⁹ The Company will use a combination of digital and traditional media, such

¹⁸ *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).

¹⁹ 47 C.F.R. § 54.201(d)(2).

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.

18. 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.²⁰ 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.²¹ The Company also will disclose its name or its DBA name on all materials describing the Lifeline service.²²

19. 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 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

²⁰ 47 C.F.R. § 54.405(b).

²¹ 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.*

²² 47 C.F.R. § 54.405(d).

in other states.²³

20. 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.²⁴ 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.

21. 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.²⁵

22. The Company certifies that it will comply with the service requirements applicable to Lifeline support in the Designated Service Area. There are no planned investments to be made for the Company to offer Lifeline service in the Designated Service Area. The Company will be

²³ *Lifeline Reform Order* ¶ 388.

²⁴ 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>.

²⁵ 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.

able to provide voice and broadband Internet access service to all requesting customers in the Designated Service Area upon initial ETC designation by the Commission. Further, a five-year network improvement plan is no longer necessary for entities seeking Lifeline-only designation.²⁶ Accordingly, the Company respectfully requests a waiver of the Commission's requirement to submit a two-year investment plan as the Commission has done for other Lifeline-only ETCs.²⁷

23. 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.

24. Further, as a provider of interconnected VoIP service, the Company also is subject to FCC requirements regarding back-up power.²⁸ Under FCC Rule 9.20, any provider of a facilities-based, fixed voice service offered as residential service that is not line-powered must

²⁶ *Lifeline Reform Order* ¶ 386.

²⁷ *See, e.g.*, Docket No. UT-190744.

²⁸ 47 C.F.R. § 9.20.

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.

25. 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 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.²⁹ 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.

26. 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.³⁰ If an ETC offers plans to Lifeline subscribers that are generally available to the public, the ETC may provide summary information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.³¹

27. 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

²⁹ 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>

³⁰ *Lifeline Reform Order* ¶ 49.

³¹ 47 C.F.R. § 54.401(d).

price in the Designated Service Area. The Company also will offer standalone voice services, but notes the federal Lifeline discount currently is scheduled to sunset as of December 1, 2021 for voice-only service.³² The Company's service plan information is available on its website: www.sparklight.com. These are the same plans the Company's parent Cable One is offering in Washington under the EBB Program. The Company will apply the Lifeline discount to any voice, broadband, or bundled plans that meet the FCC's minimum service requirements for Lifeline services.

28. The Company's pricing will be reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements.³³ 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 \$54.75.³⁴ 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.³⁵

29. 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.³⁶

30. FCC Rule 54.405(e). An ETC must implement certain de-enrollment procedures

³² <https://www.usac.org/lifeline/get-started/eligible-services/lifeline-supported-voice-service/>.

³³ 47 C.F.R. § 54.313(a)(2), (3).

³⁴ *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").

³⁵ *Comparability PN* at 3.

³⁶ 47 C.F.R. § 54.401(a).

for Lifeline customers. The Company certifies it will comply with the FCC's de-enrollment procedures for Lifeline services and that it has 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 when requested by the Lifeline customer.

31. 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"). The Company 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. These processes will be consistent with the Lifeline processes currently used by the Company and its ETC affiliates, and consistent with the processes being used by Cable One (and the Company's other affiliates) for the EBB Program, which has certification and verification requirements similar to those used in the Lifeline program.

32. 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 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

For the foregoing reasons, the Company respectfully requests that the Commission designate it as a federal Lifeline ETC for the provision of voice and broadband Internet access services in the Designated Service Area on an expedited basis to ensure low-income Washington customers can continue to receive the benefits of discounted broadband Internet access and/or voice offerings after conclusion of the EBB Program.

Dated: June 14, 2021

Respectfully submitted,

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

/s/ Chérie R. Kiser

Chérie R. Kiser
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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 11th day of June 2021 in Phoenix, Arizona.



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**

EXHIBIT 1

Designated Service Area

The Designated Service Area consists of the current cable franchise areas served by Cable One, Inc. (the Company's parent) in Washington:

<u>Cable Franchise Area</u>	<u>County</u>
Asotin	Asotin
Clarkston	Asotin

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 to the Company in the RDOF auction (Auction 904). Brown shows Tribal lands. There are no Tribal lands in the Designated Service Area.

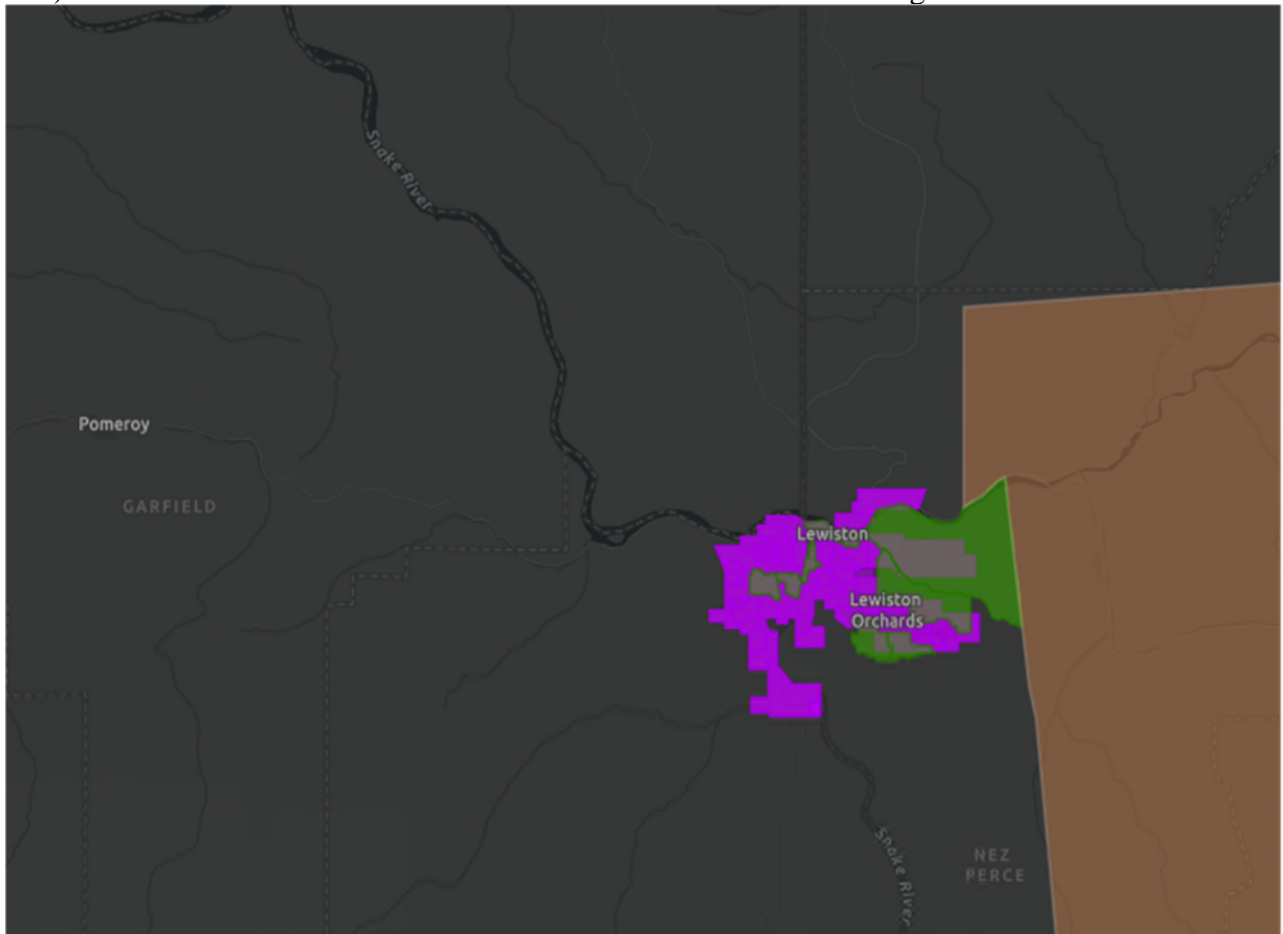


EXHIBIT 2

Washington Secretary of State Documentation

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

Kim Wyman

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
				<hr/>
				\$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
				<hr/>
				\$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>.