

STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

EV HOLDINGS 1 LLC)
Application for Designation as an Eligible)
Telecommunications Carrier for Purposes of) Docket No. _____
Receiving Federal Universal Service Support)

**APPLICATION OF EV HOLDINGS 1 LLC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

Now comes EV Holdings 1 LLC (“EV Holdings”) and pursuant to the Telecommunications Act of 1996, 47 U.S.C. §214(e)(2) (the “Act”), the rules of the Federal Communications Commission (“FCC”), specifically 47 C.F.R. §54.201, and the rules of the Washington Utilities and Transportation Commission (“Commission”), specifically §480-123-030, for the Commission to designate EV Holdings as an eligible telecommunications carrier under the provisions of Section 54.201(d) to receive federal universal service support via Lifeline for voice, broadband internet access, and broadband-voice bundled offerings.

EV Holdings is a Delaware limited liability company with a principal place of business and mailing address of 297 Kingsbury Grade, Suite 208, Stateline, NV 89449. For the reasons stated below, designating EV Holdings as an ETC is consistent with statutory and regulatory requirements and the public interest.

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to counsel at:

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and to Applicant:

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I. Introduction / Description of Company

Company Background

EV Holdings is a broadband internet service and voice-over-internet provider with headquarters in Stateline, Nevada. EV Holdings acquired Desert Winds Wireless, LLC in August 2020. Notice was filed with the Commission on June 28, 2020 and the matter was assigned Filing Number UT-200587. On December 22, 2020, EV Holdings notified the Commission that it has transitioned services from Desert Winds Wireless LLC and that all services are currently being provided by EV Holdings dba Desert Winds Wireless. The assigned docket number is UT-210017 and the agenda date for the filing is January 28, 2021 with a scheduled effective date of February 7, 2021. EV Holdings continues its predecessor's commitment to providing broadband to unserved and underserved rural communities.

Fixed Wireless Broadband Information

EV Holdings is proud of its heritage as an innovative wireless internet service provider serving rural customers neglected by large incumbent local exchange carriers and cable companies. EV Holdings will provide broadband internet access service through an antenna installed on the customer premise that will connect through a radio at a central tower. The tower will either connect directly to the internet via a fiber or will connect to another fiber-

fed tower via fixed wireless.

EV Holdings utilizes a wireless ring network with fixed base stations (access nodes) running at the 1+0 and/or 4+0 on the licensed 11 GHz or 5 GHz spectrum. This network will have 99.99% uptime and availability due to its ring structure. The technologies include fiber and/or fixed wireless (11 GHz or 5 GHz) for interconnection (backhaul) and fixed wireless—either 3.5 (CBRS), 2.4 GHz, 2.5 GHz (EBS), 5 GHz, TVWS, or 60 GHz—for last-mile service.

Future proposed deployments have several features that are unique to rural broadband network deployment. Some of the key features of the expanded network will include:

Core Network: The core of the network will be deployed at colocation facilities in data centers that are capable of servicing the anticipated service areas. Internet access will be obtained through BGP connections with multiple Internet Exchange Providers and Internet Peering facilities. Access to voice services will be managed through the core network with dedicated transport into VOIP provider network facilities. The colocation facilities are currently tied into or have access to a wide variety of middle mile networks and will be capable of terminating multiple 10Gbps and 40Gbps connections from existing fiber transport networks. Switches and routers will be deployed in a cross-threaded, high availability design that will maximize redundancy and allow for load balancing between network segments. Protocols in use at the core of the network include BGP, VRRP, GRE, MPLS, IPoE and OSPF as appropriate. DSCP tags will be honored at all routers and switches throughout the network to enforce QOS and preserve the integrity of voice and other critical latency sensitive applications.

Fiber Middle Mile: 10Gbps and 40Gbps fiber middle-mile connections will be used to distribute capacity deep into the projected service areas. Services from multiple existing fiber transport networks will tie back into the core data center networks and will also carry traffic between multiple data centers. These fiber connections will be configured with MPLS-TE, OSPF and BGP routing protocols as appropriate to handle route distribution and traffic engineering needs. Redundancy will be achieved by utilizing multiple fiber providers on geographically separate fibers into service areas where traffic can be shifted from one provider to the other in the event of an outage.

Microwave Middle Mile: A combination of licensed and unlicensed backhuls will be used to distribute connectivity from fiber middle mile locations to the last mile distribution locations. Consortium members utilize microwave backhuls to extend network connectivity from fiber middle-mile locations to more remote access points.

■ Licensed microwave spectrum types and their use case include:

- 6 Ghz, capacity up to 1.2Gbps for use on long distance connections up to 30 miles
- 11 Ghz, capacity up to 1.2Gbps for use on medium distance connections up to 15 miles
- 18 Ghz, capacity up to 1.2Gbps for use on shorter distance connections up to 8 miles

■ Unlicensed microwave spectrum types and their use case include:

- 24 Ghz, capacity up to 1Gbps for use on short connections up to 3 miles
- 60 Ghz, capacity up to 10Gbps for use on medium connections up to 10 miles
- 5 Ghz, capacity of up to 600 Mbps for use on lower capacity connections up to 10 miles

■ Each tower site will be within four network segments of a fiber backhaul point to ensure adequate capacity and network performance. Per hop latency for each microwave

backhaul is approximately 5ms, so middle mile latency to the Internet backbone points from the most remote segments of the network should be under 21ms.

Last-Mile: The last mile network segments will be delivered via fixed wireless, hybrid fiber/coax cable network or active ethernet over fiber.

- Fixed Wireless: Last mile service from each tower will be delivered by Cambium TDD equipment in CBRS spectrum and in unlicensed 5Ghz and lightly licensed 6Ghz for the baseline and above baseline tiers. CBRS spectrum will be used for Non-line of Sight (NLOS) locations and unlicensed 5ghz or 6Ghz will be used for Line of Sight (LOS) locations. A typical tower will have four base stations in the appropriate spectrum choice, mounted at an adequate height on a tower site to provide the needed coverage into the service area. Some towers may have both types of base stations (CBRS and 5Ghz) in place to maximize available capacity.

EV Holdings offers the following fixed wireless broadband plans:

Broadband			
	Speed	Price	Lifeline Pricing
Value	4 Mbps Download / 1 Mbps Upload	\$49.99	TBD
Fast	8 Mbps Download / 2 Mbps Upload	\$59.99	TBD
Max	16 Mbps Download / 4 Mbps Upload	\$79.99	TBD
ProMax	25 Mbps Download / 5 Mbps Upload	\$99.99	TBD

The company also has begun deploying fiber optic networks by partnering with the Benton and Franklin PUDs, the city of Richland, and NoaNet to provide state of the art fiber broadband to businesses. The Company offers high speed connectivity with industry standard security and adjustable speeds to both residences and business in its coverage area.

Voice Services Information

EV Holdings will offer voice services using two managed voice providers in the different areas proposed. Atheral will be one of the providers used, and Momentum Telecom will be another one used for voice termination. Both of these providers have the ability to terminate local inbound calls, national/international calls and provide call services and e911 services. o

Atheral: <http://www.atheral.com/>. Platform features include, but are not limited to:

- CALEA Compliant
- Call Detail Records (CDR's)
- DID Included Per Seat
- e911 Included Per Seat
- Fault-Tolerant
- Active-Active Architecture
- Geo-Redundant
- SNAPMobile Phone App Integration
- QOS and MOS Monitoring Per Call
- Call Control
- OAuth Permissions
- Multi-Tenant With Unlimited Domains
- Advanced Security & Fraud Detection
- Auto Block Failed Registrations
- Auto Block SIP Port Scanning
- Auto Block Promiscuous SIP Devices
- Velocity Filter for Bad Digits
- SIP Call Traces
- Zero-Touch Device Provisioning

EV Holdings will also utilize Momentum Telecom to provide voice services. Its platform features include, but are not limited to:

- Session Border Controller deployed as the demarcation point of service at the customer site, providing key features like Quality of Service (QoS), security, survivability and WAN link redundancy. This technology allows Momentum to provide measurement and call quality control down to the individual handset ensuring the customer's service is performing to the highest level of standards.

- Comprehensive security services such as a stateful packet inspection firewall, VoIP awareness, DoS and flood protection, trusted host connections, and 3DES, AES, SHA-1, MD-5 ciphers.

- EdgeView and other technologies to monitor and capture key call quality statistics like jitter, packet loss and mean opinion scores (MOS) for every customer and location.

- Momentum's network supports Ethernet, analog and multi-link bonded T1 interfaces for converged VoIP networks. Additionally, Momentum Telecom EdgeMarc routers can automatically switch to the secondary route if a communication failure is detected on the primary route—reducing the risk of the WAN link being the single point of failure.

- High Availability is designed to eliminate a single point of failure. High Availability uses the concept of a Primary and Secondary system with a heartbeat to define which system is active and which one is Idle. If the Active system is failing, then the Idle system becomes active automatically.

- Voice traffic is given guaranteed bandwidth, packet prioritization and data traffic shaping to deliver a higher quality of service than regular traffic.

- VLAN configurations allow connections to Ethernet switches to separate voice traffic from regular data traffic ensuring quality treatment of VoIP traffic.

- Per call statistics measure the LAN and WAN traffic and all voice media passing through the system is evaluated with a MOS Score, which is a user's view of the listening and conversational quality of the network.

- Voice traffic is marked with DSCP tags to ensure prioritization in transit across the network to the Internet Exchange Point. Dedicated transport from the IXP to the Managed Service Provider will deliver traffic to the provider's voice switches.

- Additional QOS features will be enabled through the use of MPLS to prioritize traffic for sensitive applications.

- Latency from the IXP to the tower nearest to the customer will be in the 25-30ms range, well within the acceptable range to maintain quality MOS scores for voice service.

EV Holdings will manage provisioning the service for the customer, all billing aspects, and troubleshooting any calling issues that may arise. Residential customers will be served with Analog Telephone Adapters (ATAs) and IP phones using SIP and UDP/RDP protocols. Both VoIP providers support SIP on the Subscriber Gateway interface and traditional SS-7 and or SIP trunking to many of the most common Long Distance Voice Carriers on the PSTN side of the switch. Calling features available include all of the traditional calling features; call

forwarding, caller ID, voice mail, find-me-follow-me, etc. along with more advanced services; Hosted IP Centrex, inbound/outbound call management, etc. With the overall decline in voice services, the switch trunking is currently over provisioned and will have sufficient capacity to add the additional lines with no need for expansion.

Voice and Broadband Plans

EV Holdings' residential digital voice service plan is \$25.00 with EV Holdings broadband and \$30 without. Lifeline customers will receive the \$9.25 benefit, lowering the price to \$15.75 per month or \$20.75 respectively. The customer can use its own VoIP-enabled phone, pay an additional fee to use the service's mobile app, or purchase a phone from EV Holdings. Lifeline customers will receive all of the same features as a non-Lifeline customer. Features include call waiting, caller ID, call forwarding, call transfer, voicemail, and free long distance in the U.S. and Canada.

Lifeline Implementation

EV Holdings will implement Lifeline based on the current rules and regulations established by the Federal Communications Commission ("FCC") and administered by the Universal Service Administrative Company ("USAC") as those rules may change in the future. EV Holdings will follow the most recent Report and Orders and Lifeline Reform Order to begin services. The customer will have an option of a residential VoIP only package, internet package, or a bundled voice and Internet package. EV Holdings will price its Lifeline service at \$9.25 less than its equivalent non-Lifeline service. Therefore, EV Holdings' Lifeline service will represent a dollar-for-dollar reduction from its comparable non-Lifeline rate and will

represent a pass-through of the full amount of support to the qualifying low-income consumer. EV Holdings will allow customers to apply the Lifeline subsidy, on a full pass-through basis to packages of voice and broadband services.

EV Holdings will build a dedicated Lifeline landing page with detailed information, how to apply, and how to contact USAC. Links to the application and worksheet, both English and Spanish, for each state will be available for download. EV Holdings customer service agents will be trained to help customers fill out and return the form.

Along with the application, EV Holdings will have a cover sheet with information on how to contact EV Holdings for help, how to send the application to EV Holdings (both electronically and by mail), and what additional information EV Holdings need from the customer. Additional information will include a copy of their current driver's license, copy of their paycheck stubs/SNAP card/Medicaid card/SSI statement/Tribal program, etc., what service(s) they are interested in, and how they heard about EV Holdings.

Upon receipt of the filled-out application, EV Holdings' Customer Service Department will process the application through the National Lifeline Accountability Database and let the customer know if they qualify for Lifeline. Additionally, the customer service representative will determine if the customer is in the network service area. Based on their qualification status, services they are interested in, and if service from EV Holdings is available in their area, the appropriate packages will be offered to the customer for sign up and installation will be scheduled.

EV Holdings will submit monthly reimbursement reports to USAC, and will work with USAC on re-certifying any current customers. All documentation related to the customer and

Lifeline will be maintained while the customer is with EV Holdings and for three years after they change providers.

II. Federal Telecommunications Act of 1996, Eligible Telecommunications Carrier

Pursuant to Section 214(e)(2) of the Act, a state commission may, upon its own motion, or upon request, designate a common carrier to be an “eligible telecommunications carrier” for purposes of receiving universal service support under the Act. Section 214(e)(2) also requires that the carrier designated meet the requirements of Section 214(e)(1). Section 214(e)(1) states:

A common carrier designated as an eligible telecommunications carrier... shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received -

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using a media of general distribution.

Section 54.201(b) of the FCC’s Rules states that the Commission shall, on its own motion or upon request, designate a common carrier an ETC so long as the carrier meets the requirements of Section 54.201(d), which restates the requirements found in Section 214(e)(1) of the Act. Section 214(e)(2) of the Act and Section 54.201(c) of the FCC’s Rules state that the Commission may, in the case of an area serviced by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC for a service area the Commission designates, provided each additional requesting carrier

satisfies Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's Rules. Before designating an additional ETC for an area serviced by a rural telephone company, the Commission shall find that such designation is in the public interest.

III. Designated Service Area

Section 214(e)(2) of the Act states that an ETC shall be designated for a "service area" by the state commission. And per §480-123-030(1)(a), EV Holdings requests statewide authority as an eligible telecommunications carrier.

IV. Requirements for ETC Designation

A. EV Holdings will offer the services that are supported by federal universal service support mechanisms throughout the service area for which ETC designation is received.

EV Holdings is a common carrier for purposes of obtaining ETC designation under 47 U.S.C. § 214(e)(1). EV Holdings commits to provide (i) voice grade access to the public switched telephone network ("PSTN") or its functional equivalent; (ii) minutes of use for local service provided at no additional charge to end users; (iii) access to emergency services; and (iv) toll limitation services to qualifying low-income consumers as provided in accordance with 47 C.F.R. §§54.400 *et seq.*

i. Voice grade access to the public switched telephone network

In its *USF/ICC Transformation Order*, the FCC modified the definition of a supported service to a technologically-neutral approach, allowing companies to

provision voice service over any platform, including the PSTN and IP networks.¹ Thus, the FCC amended Section 54.101 to specify that the functionalities of eligible voice telephony services include voice grade access to the public switched network or its functional equivalent.² The FCC further explained that increasingly “consumers are obtaining voice services not through traditional means but instead through interconnected VoIP providers offering service over broadband networks.”³ Interconnected VoIP services “allow customers to make real-time voice calls to, and receive calls from, the PSTN, and increasingly appear to be viewed by consumers as substitutes for traditional voice telephone services.”⁴ Thus, the FCC concluded that its authority to promote universal services in this context “does not depend on whether interconnected VoIP services are telecommunications services or information services under the Communications Act.”⁵ EV Holdings will therefore provide voice-grade access to the PSTN by providing interconnected VoIP service throughout the designated service area.

ii. Minutes of Use

“Local usage” means an amount of minutes of use of exchange services, prescribed by the FCC, provided free of charge to end users.”⁶ The FCC has not specified a minimum amount of local usage that an ETC must offer. EV Holdings will meet the local usage

¹ *In the Matter of Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, 26 FCC Rcd 17663, 17692-93 (2011) (“USF/ICC Transformation Order”).

² *Id.*; See also 47 C.F.R. §54.101(a).

³ *USF/ICC Transformation Order* at ¶163.

⁴ *Id.*

⁵ *Id.*

⁶ 47 C.F.R. § 54.101(a)(2).

requirement by including local usage in its rate plans. The Company will comply with any minimum local usage requirements adopted by the FCC or this Commission.

iii. Access to emergency services

ETCs are required to provide access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911 (“E911”), to the extent the local government in an ETC's service area has implemented 911 or enhanced 911 systems. EV Holdings will provide access to emergency services by providing 911 and E911 for all of its customers to the extent that the local governments in its designated service areas have implemented 911 and E911.

iv. Toll limitation for Qualifying Low-Income Consumers

EV Holdings does not distinguish between toll and non-toll for its voice offering. To the extent EV Holdings offers a service that distinguishes between toll and non-toll calls, it will offer toll limitation to qualifying low-income consumers at no additional charge.

B. Broadband Internet Access Service

Pursuant to 47 C.F.R. 54.101(a)(2), EV Holdings will provide broadband services with 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.

C. EV Holdings will comply with the requirements of 47 USC 214(e)(1).

Throughout its service area, EV Holdings commits to: (A) offer supported services “either using its own facilities or a combination of its own facilities and resale of

another carrier's services (including the services offered by another eligible telecommunications carrier)” and (B) advertise the availability of such services and the charges therefor using media of general distribution

i. EV Holdings will use its own facilities to provide the supported services

EV Holdings provides high-speed broadband and digital telephone services to residential, commercial, and enterprise customers utilizing a combination of unlicensed and licensed wireless frequencies. EV Holdings has deployed a next generation fixed wireless network targeting rural markets outside of metropolitan areas that are either unserved or underserved. EV Holdings will provide supported services using its network infrastructure, consisting of last mile connections and network equipment and components. It will also utilize its own facilities to provide backhaul for interconnection via a combination of fiber and wireless microwave technologies.

ii. EV Holdings will advertise the availability of its service throughout its service area.

EV Holdings will advertise the availability of the Supported Services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services. EV Holdings agrees to comply with all form and content requirements, if any, promulgated by the FCC and this Commission in the future and required of all designated ETCs, including by disclosing the Applicant’s name, that the service is a Lifeline service, that it is a government assistance program, that the service is non-transferable, and that it is available only to eligible consumers and limited to one discount per economic household.

D. EV Holdings will comply with the FCC's additional eligibility criteria contained in 47 CFR §54.202.

- i. EV Holdings certifies that it will comply with the service requirements applicable to the support that it receives;

EV Holdings certifies that it will comply with the service requirements applicable to the support that it receives. EV Holdings commits to provide supported services throughout the designated service area by committing to provide service to customers who make a reasonable request for service. EV Holdings will commence offering service to all qualified consumers after it is certified as an ETC and soon after it receives ultimate approval from the FCC pursuant to applicable build-out requirements.

- ii. Applicant will provision service that is able to remain functional in emergency situations within industry standards for VoIP services;

EV Holdings will provision service with sufficient back-up power to remain functional without an external power source in emergency situations. EV Holdings is able to re-route traffic around damaged facilities and will be able to manage traffic spikes resulting from emergency situations. Applicant uses battery back-up power in the field and battery backup power at its NOC for wireless internet service.

EV Holdings' VoIP service requires an Internet Protocol (IP) connection to the Company's network or public Internet and 120VAC power to function. In the event of a failure of the IP connection or the local AC power, the service, including the E911 feature, will not function. Upon activation of a customer, EV Holdings will provide the customer with a notification containing clear instructions on the use of emergency services.

EV Holdings' VoIP service is not specifically used as a nomadic device. Customers can, through mobile applications, move the device to different locations. The end users

registered service address is the only location at which the subscriber is authorized to use the service. The service will work if the device is moved to another location within the US and connected to a public internet connection; however, this is only authorized when the subscriber updates their service address prior to using the service at the new location by calling the Company's customer service toll free telephone number 800 610-2302.

EV Holdings service includes enhanced 911 services (E911). When service is initially provisioned, and any time the subscriber's service address is updated, the service location is automatically transmitted to a third party E911 provider who geocodes the address, associates it with a local Public Safety Answering Point (PSAP), provides an electronic positive affirmation that the address was properly geocoded, and stores the record on our behalf. When a subscriber dials 911, the call is routed to the third party 911 provider and then from there to the local PSAP. The location information is transmitted in the call signaling to the local PSAP, and is visible to the operator in E911 enabled PSAPs. In jurisdictions where an E911 service fee is imposed on Interconnected VoIP Services by law, the fee is passed through to the end user and remitted to the local authority in accordance with applicable policy.

iii. EV Holdings will satisfy consumer protection and service quality standards.

Upon designation as an ETC, EV Holdings will satisfy all consumer protection and service quality standards as provided in 47 C.F.R § 54.202(a)(3) as well as all applicable state specific consumer protection and service quality standards including §480-120.

E. Designation of EV Holdings as an ETC is within the public interest.

Designation of EV Holdings as an ETC will serve the public interest by facilitating the

FCC's goal of developing voice and broadband networks in rural, high-cost areas. Under the 1996 Act, "upon request and consistent with the public interest, convenience and necessity" the Commission shall "designate more than one common carrier as an eligible telecommunications carrier for a service area designated" by the Commission.⁷ Before such a designation, the Commission shall find that the designation is in the public interest.⁸ In its *2005 ETC Order*, the FCC determined that the benefits of increased consumer choice, and the unique advantages of the applicant's service offering are components of a public interest analysis.⁹

Expedited designation of EV Holdings will serve the public interest by ensuring that the company is eligible to receive federal USF support, including through the FCC's high-cost programs. EV Holdings will use this funding to directly advance the FCC's goal of deploying voice and broadband-capable networks in rural, high-cost areas while ensuring that rural consumers and anchor institutions benefit from innovations in communications technology. In particular, EV Holdings will use federal USF support to expand access to high-speed, high-quality broadband and voice provided through interconnected VoIP and fixed wireless for residents of rural Washington. These advanced communications services will provide important connectivity to consumers, businesses, and community anchor institutions, including rural schools, libraries and medical facilities and are a unique alternative to services provided by traditional wireline carriers within the Company's

⁷ 47 C.F.R. 54.201(c).

⁸ *Id.*

⁹ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, FCC 05-46, 20 FCC Rcd 6371, 6389 (rel. Mar. 15, 2005) ("*2005 ETC Order*").

designated service area.

Designation of EV Holdings as an ETC is also in the public interest because it will promote increased competitive choice, thereby increasing innovation and incenting other carriers to improve their existing networks in order to remain competitive. This will result in greater access to high-speed broadband and voice services, as well as improved service quality for residents of underserved communities in rural areas of Washington. EV Holdings' services will provide consumers with additional choices in communications service providers, as well as a variety of service offerings at competitive rates.

V. Relief Requested

For the reasons set forth above, EV Holdings respectfully requests: (i) an expeditious Order designating the Company as an ETC in Washington for the purpose of being eligible to receive federal funding pursuant to the FCC's Lifeline program; and (ii) such other relief as this Commission deems to be just and equitable.

Respectfully submitted,



Kristopher E. Twomey
Counsel to EV Holdings

January 21, 2021

Compliance with WAC §480-123-030

(1)(a)- page 11

(1)(b)- page 11

(1)(c)- pages 11-13

(1)(d)- not applicable. EV Holdings does not seek eligible telecommunications carrier status for purposes of the FCC Rural Digital Opportunity Fund auction 904. EV Holdings intends to use Lifeline support to provide subsidized broadband throughout its current and future service footprint.

(1)(e)- page 14

(1)(f)- not applicable

(1)(g)- page 15

(1)(h)- page 16

(2) and RCW 9A.72.085- see attached notarized affidavit

Affidavit of Dimitry Gershenson

AFFIDAVIT

State of Oregon

County of Multnomah

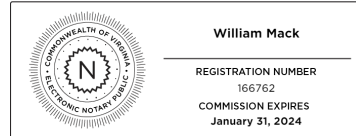
Dimitry Gershenson, after being duly sworn, states the following:

1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.
2. I am Chief Operating Officer of EV Holdings I dba Desert Winds Wireless ("EV"). Acting on behalf of EV, I have read the Petition to which this Affidavit is attached. I have knowledge of the facts stated in the Petition and those facts are true to the best of my knowledge and belief.
3. EV certifies that it is a common carrier under Sections 214(e)(1) and 214(e)(6) of the Communications Act of 1934, as amended ("Act").
4. EV commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier statewide in Washington.
5. EV certifies that it will meet all the Commission's requirements for designation as an ETC under Section 214(e)(6) of the Act.
6. I am the corporate officer that will be responsible for certifying EV's use of federal high-cost support.
7. EV will use the federal high-cost support that it receives only to provide, construct, upgrade and maintain facilities and services for which the support is intended.
8. EV certifies that neither it nor any party to its application is subject to a denial of federal benefits, including Federal Communications Commission ("FCC") benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, as implemented in Section 1.2002 of the FCC's rules.

Dimitry Gershenson

Dimitry Gershenson
Chief Operating Officer

Subscribed and sworn to
before me this 15th day
of January, 2021



Virginia
Augusta

William Mack

Notarized online using audio-video communication

Notary Public William Mack

My Commission expires: 01/31/2024