



April 20, 2021

VIA E-FILING PORTAL

Washington Utilities and Transportation Commission
Attn: Records Department
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Lacey, WAS 98503

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Docket UT-210149 Comment Wireless, LLC's First Amended Petition for Designation as an Eligible Telecommunications Carrier

Dear Sir or Madam:

Enclosed please find Comment Wireless, LLC's First Amended Petition for Designation as an Eligible Telecommunications Carrier for purposes of becoming eligible to receive Rural Digital Opportunity Funds.

This amendment is being filed in response to a request from the Commission Staff ("Staff") for clarification regarding Commnet's proposed ETC designated area and to reflect materials that Commnet filed in this docket that are pertinent to its substantive investment plans for the Auction 904 finding it has been awarded. These clarifications are reflected on pages 1, 4 Exhibit A and Exhibit C. Page 10 has also been updated to reflect an updated signature.

Should you have any questions or concerns with regards to this filing, please do not hesitate to contact me at 501-448-1249 or via e-mail at rranaraja@atni.com.

Very truly yours,

Rohan Ranaraja
Executive Director of Regulatory Affairs

**BEFORE THE
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION**

PETITION OF COMMNET WIRELESS, LLC)
FOR DESIGNATION AS AN ELIGIBLE) Docket UT-210149
TELECOMMUNICATIONS CARRIER)

**FIRST AMENDED PETITION OF COMMNET WIRELESS, LLC
FOR DESIGNATION AS ELIGIBLE TELECOMMUNICATIONS CARRIER**

Commnet Wireless, LLC ("Commnet") respectfully submits this Petition for designation as an Eligible Telecommunications Carrier ("ETC") to the Washington Utilities and Transportation Commission ("Commission") pursuant to 47 U.S.C. § 214(e) of the Communications Act of 1934 (the "Act"), 47 C.F.R. part 54, subpart C of the rules of the Federal Communications Commission ("FCC"), and WAC § 480-123-030 through 040. Commnet seeks ETC designation in Clallam, Kittitas and San Juan counties - specifically Census Blocks within Census Block Groups 530090006001, 530379751001, 530559603002, 530559603004 and 530559605001 identified in Exhibit A- (the "Designated Service Area"), for the purpose of receiving federal high cost universal service support awarded via the Rural Digital Opportunity Fund Phase I Auction to deploy voice and broadband services to eligible locations within those Census Block Groups. Although Commnet has been identified as a winning bidder, Commnet's receipt of the support is conditioned upon it obtaining designation as an ETC for the Designated Service Area.

Section 214(e)(2) of the United States Code expressly authorizes the Commission to designate a company that meets the requirements of 47 U.S.C. § 214(e)(1) - such as

Commnet as an ETC. Moreover, the Washington State Administrative Code requires that 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." WAC 480-123-040. As demonstrated in this Petition, Commnet meets all state and federal requirements for ETC designation, and designating Commnet as an ETC in the proposed area would advance the goals of universal service and is in the public interest.

In support of this Petition, Commnet states as follows:

1. BACKGROUND

Commnet is a wholly-owned subsidiary of ATN International, Inc., a publicly traded corporation headquartered in Beverly, Massachusetts. Commnet provides voice and broadband service in rural area principally in areas with a population of 2500 or less. Commnet operates facilities based networks in 11 states. Commnet provides mobile voice and broadband services as well as fixed broadband services over those facilities on both a wholesale and retail basis. Commnet is presently designated and operates as an ETC in certain areas of Arizona, Colorado, Montana, New Mexico, Nevada, Utah and Wyoming. Commnet has experience participating in federal universal service programs and is/has been a recipient of frozen high cost support, mobility fund support, tribal mobility fund support and CAF II support.

The contact information for Applicant is as follows:

Rohan Ranaraja
Commnet Wireless, LLC
1001 Technology Drive, Suite 102
Little Rock, AR 72223

501.448.1249
rranaraja@atni.com

II. COMMNET MEETS THE STATE AND FEDERAL STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION

As discussed in more detail below, Commnet satisfies all applicable requirements for ETC designation as established under Washington law, federal law, and the rules of the FCC, including WAC 480-123-030, 47 U.S.C. § 214(e) and 47 C.F.R. § 54.201 et seq. Designating Commnet as an ETC for purposes of receiving universal service funds via the RDOF program will serve the public interest by allowing Commnet to receive support to serve the areas that it is obligated to serve, thereby expanding the number of new locations that will receive coverage for the finite budget available.

A. Commnet Meets All State Requirements for ETC Designation

WAC 480-123-040 states that 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." Commnet satisfies each of the requirements of WAC 480-123-030 as follows:

- i. In satisfaction of WAC 480-123-030(1)(a), Commnet identifies the area for which designation is sought as the State of Washington. The proposed "Designated Service Area" is clearly identified in Exhibit A attached hereto.
- ii. In satisfaction of WAC 480-123-030(1)(b), Commnet will offer the services supported by federal universal service support mechanisms throughout the Designated Service Area using

its own facilities or a combination of its own facilities and another carriers facilities on a limited basis.

- iii. In satisfaction of WAC 480-123-030(1)(c), Commnet describes herein how each supported service will be provided in greater detail below.
- iv. In satisfaction of WAC 480-123-030(1)(d), Commnet directs the Commission to Section D below, Exhibit C and the FCC Form 683 (Long Form) materials that Commnet filed as a supplement on March 24, 2021 in this docket. Combined, this information is Commnet's substantive plan of the investments to be made with initial federal support during the first two years as well as other voice and broadband deployments that Commnet plans to carry out using the funds from the Auction.
- v. In satisfaction of WAC 480-123-030(1)(e), Commnet will advertise the availability of services including Lifeline service. Commnet plans to advertise its services on its website, through local media and other community outlets.
- vi. Commnet is not subject to WAC 480-123-030(1)(f), which pertains only to providers of commercial mobile radio service with cell sites.
- vii. In satisfaction of WAC 480-123-030(1)(g), Commnet is able to remain functional in emergencies and complies with WAC 480-120-411, as described herein, including by maintaining adequate back up battery power and/or backup mobile generators that can be deployed.
- viii. In satisfaction of WAC 480-123-030(1)(h), Commnet commits to abide by all applicable consumer protection and service quality standards of chapter 480-120 WAC. Presently,

Commnet employs customer service representatives who are available and capable of addressing the terms of service, rates /charges, disputes and other matters.

ix. Commnet provides herein, as Exhibit B, a supporting Declaration certifying the information in this Petition (WAC 480-123-030(2)).

x. Commnet commits to fully comply with the annual certification requirements adopted by the Commission in WAC 480-123-060, 480-123-070, and 480-123-080, including requesting certification by July 1st each year, certifying that federal high-cost support is used as intended, and reporting the following information on an annual basis with respect to the Designated Service Area:

- Use of federal funds and benefits to customers;
- Local service outages;
- The number and details of unfulfilled service requests;
- Complaints per one thousand connections;
- Certification of compliance with applicable service quality standards and consumer protection rules;
- Certification of ability to function in emergency situations;
- Advertising certification, including advertisement on any Indian reservations within the Designated Service Area.

To the extent Commnet has filed a report with the FCC or another federal agency that provides the data requested by the Commission, Commnet reserves the right to refer the Commission to such reports already filed with the federal agency, as expressly allowed by

WAC 480-123-070(8).

B. Commnet Meets All Federal Requirements For ETC Designation.

Commnet meets all criteria for designation as an ETC under federal law, including those in 47 U.S.C. § 214(e) and 47 C.F.R. § 54.201 et seq. In particular:

- i. Commnet is a common carrier (see 47 U.S.C. § 214(e) (1); 47 U.S.C. § 153 (11); 47 C.F.R. § 54.201(d); 47 C.F.R. § 54.5);
- ii. As required by 47 C.F.R. § 54.101 (b), Commnet will offer the Voice Telephone services supported by federal universal service support mechanisms as defined in 47 C.F.R. § 54.101 (a)(1) using its own facilities or a combination of its own facilities and resale of another carrier's services (47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d) (1)), including the following services:
 - Voice grade access to the public switched network or its functional equivalent;
 - Minutes of use for local service at no additional charge to end users;
 - Access to the emergency services provided by local government or other public safety organizations , such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems ; and
 - Toll limitation services to qualifying low-income consumers as provided in subpart E of 47 C.F.R. Part 54;
- iii. As described in greater detail below, Commnet will make available service to qualifying low-income consumers (47 C.F.R. § 54.405(a));
- iv. Commnet will also publicize the availability of service in a manner reasonably designed to

- reach those likely to qualify for the service (47 C.F.R. § 54.405(b));
- v. Commnet will advertise the availability of its universal service offerings and charges for such offerings using media of general distribution (47 U.S.C. § 214(e) (1)(B); 47 C.F.R. § 54.201(d)(2)), namely through a combination of media, such as advertising via radio, newspapers, magazines or other print advertisements, outdoor advertising, direct marketing , or the Internet ;
 - vi. Commnet will provide the supported services throughout the Designated Service Area (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)); and
 - vii. Commnet certifies that, in accordance with 47 U.S.C. § 254(e), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

C. Commnet Will Provide Service to Qualifying Low-Income Consumers

Upon designation as an ETC, Commnet will make a discounted service offering that meets all applicable requirements available to qualified low-income consumers. Commnet will advertise the availability of services supported by federal universal service mechanisms in a manner reasonably calculated to reach qualified low-income consumers not receiving discounts.

D. Commnet Will Deploy the Funds from the Auction to Advance the Public Interest

With the funds from the Auction, Commnet will deploy voice and broadband services to eligible locations in the Designated Service Area. Commnet plans to provide both voice and broadband service using fixed wireless technology. Commnet intends to use CBRS spectrum (PALs and GAA) and use technologies based on open industry standards, such as LTE and 5G.

Commnet will use either point-to-point microwave or fiber technology (if available) to connect each site to its core network and the internet. Commnet will provide broadband service with speeds of 100 Mbps uplink and 20 Mbps downlink in compliance with its RDOF obligations. Commnet will partner with a Managed Voice Service Provider (“MVSP”) for voice services. Commnet’s current MVSP provides standalone residential voice service, standalone business voice service, hosted PBX service and SIP trunking utilizing Network Function Virtualization-based Voice over LTE (NFV based VoLTE). Finally, Commnet will continue to monitor these connections and increase bandwidth as necessary to ensure compliance with the required service standards. These actions will promote the availability of voice and internet services in rural communities and ensure that these communities have access to what the state and federal government consider to be modern internet speeds.

III. DESIGNATION OF COMMNET AS AN ETC IS IN THE PUBLIC INTEREST

Pursuant to WAC 480-123-040, 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." 47 U.S.C. § 214(e)(2) requires that designation be "in the public interest" only where multiple ETCs are designated for areas served by a rural telephone company, and otherwise requires only that designation meet the lower threshold of being "consistent with the public interest." Section 214(e)(2) states:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission

may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

Granting Commnet's petition will serve the public interest through the deployment of broadband and voice services to unserved and underserved high-cost areas in Washington State, supporting investment in facilities and equipment, and expanding the number of competitive providers serving rural areas in Washington. Designation of Commnet as an ETC will permit Commnet to receive Auction funds, directly advancing the goals of the FCC's Auction. The resulting deployments will bring expanded voice and broadband connectivity to rural areas in Washington, helping to ensure that residents of Washington are not left on the wrong side of the digital divide, and expanding economic opportunity for communities that will benefit from increased connectivity.

By selecting Commnet as a recipient of Auction funds, the FCC has recognized that the voice and broadband services that Commnet proposes to deploy with the funds would advance the goal of the Auction, and thereby advance the goals of universal service. That is, the FCC has itself determined that Commnet's proposal has merit and would advance the public interest that the Auction is designed to serve. Because designating Commnet as an ETC will allow it to use the funds as intended to expand voice and broadband service in Washington, designation of Commnet as an ETC is plainly in the public interest.

IV. CONCLUSION

For the reasons stated herein, Commnet respectfully requests that the Commission expeditiously: (i) designate Commnet as an ETC in the Designated Service Area, (ii) send the appropriate notice of the Order designating Commnet as an ETC for the Designated Service Area to the FCC and the Universal Service Administrative; and (iii) order such other relief as may be appropriate.

Dated this 20th day of April, 2021.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Rohan Ranaraja".

Rohan Ranaraja
Executive Director of Regulatory Affairs

LIST OF EXHIBITS

Exhibit A – Proposed ETC Designated Service Area

Exhibit B - Declaration of Tom Guthrie

Exhibit C – Investment Details

EXHIBIT A

PROPOSED ETC DESIGNATED SERVICE AREA

State	County	Census Block ID	Census Block Group ID
WA	Clallam	530090006001002	530090006001
WA	Clallam	530090006001006	530090006001
WA	Clallam	530090006001007	530090006001
WA	Clallam	530090006001010	530090006001
WA	Clallam	530090006001011	530090006001
WA	Clallam	530090006001012	530090006001
WA	Clallam	530090006001014	530090006001
WA	Clallam	530090006001016	530090006001
WA	Clallam	530090006001017	530090006001
WA	Clallam	530090006001019	530090006001
WA	Clallam	530090006001021	530090006001
WA	Clallam	530090006001022	530090006001
WA	Clallam	530090006001023	530090006001
WA	Clallam	530090006001024	530090006001
WA	Clallam	530090006001025	530090006001
WA	Clallam	530090006001026	530090006001
WA	Clallam	530090006001029	530090006001
WA	Clallam	530090006001031	530090006001
WA	Clallam	530090006001034	530090006001
WA	Clallam	530090006001037	530090006001
WA	Clallam	530090006001039	530090006001
WA	Clallam	530090006001040	530090006001
WA	Clallam	530090006001041	530090006001
WA	Clallam	530090006001043	530090006001
WA	Clallam	530090006001045	530090006001
WA	Clallam	530090006001046	530090006001
WA	Clallam	530090006001048	530090006001
WA	Clallam	530090006001051	530090006001
WA	Clallam	530090006001052	530090006001
WA	Clallam	530090006001053	530090006001
WA	Clallam	530090006001054	530090006001
WA	Clallam	530090006001055	530090006001
WA	Clallam	530090006001056	530090006001
WA	Clallam	530090006001058	530090006001
WA	Clallam	530090006001061	530090006001

State	County	Census Block ID	Census Block Group ID
WA	Clallam	530090006001062	530090006001
WA	Clallam	530090006001065	530090006001
WA	Clallam	530090006001067	530090006001
WA	Clallam	530090006001068	530090006001
WA	Clallam	530090006001069	530090006001
WA	Clallam	530090006001074	530090006001
WA	Clallam	530090006001075	530090006001
WA	Clallam	530090006001083	530090006001
WA	Clallam	530090006001084	530090006001
WA	Clallam	530090006001091	530090006001
WA	Clallam	530090006001095	530090006001
WA	Clallam	530090006001096	530090006001
WA	Clallam	530090006001097	530090006001
WA	Clallam	530090006001098	530090006001
WA	Clallam	530090006001099	530090006001
WA	Clallam	530090006001101	530090006001
WA	Clallam	530090006001102	530090006001
WA	Clallam	530090006001103	530090006001
WA	Clallam	530090006001105	530090006001
WA	Kittitas	530379751001061	530379751001
WA	Kittitas	530379751001069	530379751001
WA	Kittitas	530379751001072	530379751001
WA	Kittitas	530379751001084	530379751001
WA	Kittitas	530379751001087	530379751001
WA	Kittitas	530379751001088	530379751001
WA	Kittitas	530379751001090	530379751001
WA	Kittitas	530379751001091	530379751001
WA	Kittitas	530379751001096	530379751001
WA	Kittitas	530379751001097	530379751001
WA	Kittitas	530379751001102	530379751001
WA	Kittitas	530379751001104	530379751001
WA	Kittitas	530379751001107	530379751001
WA	Kittitas	530379751001108	530379751001
WA	Kittitas	530379751001112	530379751001
WA	Kittitas	530379751001116	530379751001
WA	Kittitas	530379751001119	530379751001

State	County	Census Block ID	Census Block Group ID
WA	Kittitas	530379751001124	530379751001
WA	Kittitas	530379751001128	530379751001
WA	Kittitas	530379751001129	530379751001
WA	Kittitas	530379751001132	530379751001
WA	Kittitas	530379751001138	530379751001
WA	Kittitas	530379751001140	530379751001
WA	Kittitas	530379751001142	530379751001
WA	Kittitas	530379751001143	530379751001
WA	Kittitas	530379751001153	530379751001
WA	Kittitas	530379751001154	530379751001
WA	Kittitas	530379751001168	530379751001
WA	Kittitas	530379751001169	530379751001
WA	Kittitas	530379751001172	530379751001
WA	Kittitas	530379751001175	530379751001
WA	Kittitas	530379751001176	530379751001
WA	Kittitas	530379751001177	530379751001
WA	Kittitas	530379751001178	530379751001
WA	Kittitas	530379751001203	530379751001
WA	Kittitas	530379751001211	530379751001
WA	Kittitas	530379751001212	530379751001
WA	Kittitas	530379751001213	530379751001
WA	Kittitas	530379751001216	530379751001
WA	Kittitas	530379751001236	530379751001
WA	Kittitas	530379751001237	530379751001
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WA	Kittitas	530379751001261	530379751001
WA	Kittitas	530379751001270	530379751001
WA	Kittitas	530379751001273	530379751001
WA	Kittitas	530379751001275	530379751001
WA	Kittitas	530379751001276	530379751001
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WA	Kittitas	530379751001280	530379751001

State	County	Census Block ID	Census Block Group ID
WA	Kittitas	530379751001282	530379751001
WA	Kittitas	530379751001283	530379751001
WA	Kittitas	530379751001284	530379751001
WA	Kittitas	530379751001333	530379751001
WA	Kittitas	530379751001339	530379751001
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WA	Kittitas	530379751001443	530379751001
WA	Kittitas	530379751001444	530379751001
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WA	Kittitas	530379751001502	530379751001
WA	Kittitas	530379751001504	530379751001
WA	Kittitas	530379751001505	530379751001
WA	Kittitas	530379751001506	530379751001
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WA	Kittitas	530379751001536	530379751001
WA	Kittitas	530379751001537	530379751001
WA	Kittitas	530379751001540	530379751001
WA	Kittitas	530379751001541	530379751001
WA	Kittitas	530379751001542	530379751001
WA	Kittitas	530379751001543	530379751001
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WA	Kittitas	530379751001547	530379751001
WA	Kittitas	530379751001548	530379751001
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WA	Kittitas	530379751001552	530379751001
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WA	Kittitas	530379751001560	530379751001
WA	Kittitas	530379751001566	530379751001
WA	Kittitas	530379751001567	530379751001
WA	Kittitas	530379751001568	530379751001
WA	Kittitas	530379751001579	530379751001
WA	Kittitas	530379751001585	530379751001
WA	Kittitas	530379751001586	530379751001
WA	Kittitas	530379751001614	530379751001
WA	Kittitas	530379751001626	530379751001
WA	Kittitas	530379751001628	530379751001

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WA	Kittitas	530379751001635	530379751001
WA	Kittitas	530379751001636	530379751001
WA	Kittitas	530379751001637	530379751001
WA	Kittitas	530379751001657	530379751001
WA	Kittitas	530379751001729	530379751001
WA	Kittitas	530379751001730	530379751001
WA	Kittitas	530379751001731	530379751001
WA	San Juan	530559603002007	530559603002
WA	San Juan	530559603002010	530559603002
WA	San Juan	530559603002011	530559603002
WA	San Juan	530559603002012	530559603002
WA	San Juan	530559603002013	530559603002
WA	San Juan	530559603002015	530559603002
WA	San Juan	530559603002016	530559603002
WA	San Juan	530559603002017	530559603002
WA	San Juan	530559603002018	530559603002
WA	San Juan	530559603002019	530559603002
WA	San Juan	530559603002020	530559603002
WA	San Juan	530559603002025	530559603002
WA	San Juan	530559603002026	530559603002
WA	San Juan	530559603002027	530559603002
WA	San Juan	530559603002030	530559603002
WA	San Juan	530559603002032	530559603002
WA	San Juan	530559603002033	530559603002
WA	San Juan	530559603002034	530559603002
WA	San Juan	530559603002035	530559603002
WA	San Juan	530559603002036	530559603002
WA	San Juan	530559603002041	530559603002
WA	San Juan	530559603004004	530559603004
WA	San Juan	530559603004014	530559603004
WA	San Juan	530559603004018	530559603004
WA	San Juan	530559603004022	530559603004
WA	San Juan	530559603004049	530559603004
WA	San Juan	530559603004055	530559603004
WA	San Juan	530559603004056	530559603004

State	County	Census Block ID	Census Block Group ID
WA	San Juan	530559603004060	530559603004
WA	San Juan	530559603004061	530559603004
WA	San Juan	530559603004063	530559603004
WA	San Juan	530559603004064	530559603004
WA	San Juan	530559603004065	530559603004
WA	San Juan	530559603004067	530559603004
WA	San Juan	530559603004068	530559603004
WA	San Juan	530559603004069	530559603004
WA	San Juan	530559603004071	530559603004
WA	San Juan	530559603004072	530559603004
WA	San Juan	530559603004078	530559603004
WA	San Juan	530559603004086	530559603004
WA	San Juan	530559603004088	530559603004
WA	San Juan	530559603004092	530559603004
WA	San Juan	530559603004093	530559603004
WA	San Juan	530559603004094	530559603004
WA	San Juan	530559603004095	530559603004
WA	San Juan	530559603004096	530559603004
WA	San Juan	530559603004100	530559603004
WA	San Juan	530559603004101	530559603004
WA	San Juan	530559603004104	530559603004
WA	San Juan	530559603004105	530559603004
WA	San Juan	530559603004109	530559603004
WA	San Juan	530559603004112	530559603004
WA	San Juan	530559603004119	530559603004
WA	San Juan	530559603004120	530559603004
WA	San Juan	530559603004126	530559603004
WA	San Juan	530559603004128	530559603004
WA	San Juan	530559603004132	530559603004
WA	San Juan	530559603004133	530559603004
WA	San Juan	530559603004134	530559603004
WA	San Juan	530559603004139	530559603004
WA	San Juan	530559603004140	530559603004
WA	San Juan	530559603004141	530559603004
WA	San Juan	530559603004142	530559603004
WA	San Juan	530559605001002	530559605001

State	County	Census Block ID	Census Block Group ID
WA	San Juan	530559605001003	530559605001
WA	San Juan	530559605001004	530559605001
WA	San Juan	530559605001006	530559605001
WA	San Juan	530559605001007	530559605001
WA	San Juan	530559605001008	530559605001
WA	San Juan	530559605001009	530559605001
WA	San Juan	530559605001011	530559605001
WA	San Juan	530559605001013	530559605001
WA	San Juan	530559605001014	530559605001
WA	San Juan	530559605001016	530559605001
WA	San Juan	530559605001017	530559605001
WA	San Juan	530559605001018	530559605001
WA	San Juan	530559605001019	530559605001
WA	San Juan	530559605001020	530559605001
WA	San Juan	530559605001021	530559605001
WA	San Juan	530559605001022	530559605001
WA	San Juan	530559605001023	530559605001
WA	San Juan	530559605001025	530559605001
WA	San Juan	530559605001028	530559605001
WA	San Juan	530559605001029	530559605001
WA	San Juan	530559605001030	530559605001
WA	San Juan	530559605001031	530559605001
WA	San Juan	530559605001032	530559605001
WA	San Juan	530559605001034	530559605001
WA	San Juan	530559605001036	530559605001
WA	San Juan	530559605001046	530559605001
WA	San Juan	530559605001048	530559605001
WA	San Juan	530559605001049	530559605001
WA	San Juan	530559605001050	530559605001
WA	San Juan	530559605001053	530559605001
WA	San Juan	530559605001054	530559605001
WA	San Juan	530559605001055	530559605001
WA	San Juan	530559605001061	530559605001
WA	San Juan	530559605001062	530559605001
WA	San Juan	530559605001063	530559605001
WA	San Juan	530559605001075	530559605001

State	County	Census Block ID	Census Block Group ID
WA	San Juan	530559605001104	530559605001
WA	San Juan	530559605001105	530559605001
WA	San Juan	530559605001113	530559605001
WA	San Juan	530559605001114	530559605001
WA	San Juan	530559605001115	530559605001
WA	San Juan	530559605001116	530559605001

EXHIBIT B

DECLARATION OF TOM GUTHRIE

DECLARATION OF TOM GUTHRIE

I, the undersigned, Tom Guthrie do hereby declare under penalty of perjury as follows:

- i. I am the Senior Vice President and General Manager of Commnet Wireless, LLC ("Commnet") and I am authorized to make this Declaration;
- ii. This Declaration is submitted in support of the Petition of Commnet Wireless, LLC for Designation as an Eligible Telecommunications Carrier the ("Petition");
- iii. I have reviewed the Petition and declare that the facts stated therein are true and correct to the best of my knowledge;
- iv. To the best of my knowledge, Commnet including all officers, directors, or persons holding five percent or more of the outstanding stock or shares (voting or non-voting) of Commnet, are not subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti- Drug Abuse Act of 1988. 21 U.S.C. § 862.
- v. I declare under penalty of perjury that the foregoing is true and correct.

Signed this 16th day of February, 2021.



Tom Guthrie

EXHIBIT C

INVESTMENT DETAILS

REDACTED PER WAC 480-07-160 – DOCUMENT IS REDACTED IN ITS ENTIRETY