

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET UT-210149
	)	
COMMNET WIRELESS, LLC	)	
	)	
For Designation as an Eligible	)	
Telecommunications Carrier in the State of	)	
Washington for Purposes of Receiving	)	
Support from the Federal Rural Digital	)	
Opportunity Fund	)	

**COMMNET WIRELESS LLC'S NOTICE OF  
CONDITIONAL RELINQUISHMENT OF  
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

Pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205(a), Commnet Wireless, LLC (“Commnet”), submits this Notice of conditional relinquishment of its designation as an eligible telecommunications carrier (“ETC”) to the Washington Utilities and Transportation Commission (“Commission”). As explained below, Commnet seeks relinquishment of its ETC status for only those census blocks in San Juan County, which are identified in Exhibit 1, conditioned on the following:

- (1) the Federal Communication Commission’s (“FCC”) approval of the joint Application of Commnet and Island Network, LLC dba Rock Island Communications (“Rock Island”) for Consent to Assignment of Domestic Section 214 Authorization (“Joint Application”) and Rock Island satisfying the conditions imposed by the FCC for completion of the transfer of funding; and
- (2) the Commission’s approval of Rock Island’s Application for Designation as an Eligible Telecommunications Carrier.

In support of this Notice, Commnet states

1. Commnet is a Delaware limited liability company that provides voice and

broadband services in rural and tribal communities in the southwestern United States. Commnet is designated as an ETC in areas where it was awarded Rural Digital Opportunity Funds (“RDOF”) in the State of Washington, including but not limited to, the census blocks in San Juan County identified in **Exhibit 1**.

2. Island Network, LLC dba Rock Island Communications (“Rock Island”) is a Washington limited liability company based in Eastsound, Washington.

3. Following the FCC’s announcement that Commnet was a winning bidder in the FCC’s Rural Digital Opportunity Fund (“RDOF”), Commnet sought ETC designation before the Commission.

4. On May 20, 2021, the Commission issued an Order granting Commnet Petition for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Support from the Rural Digital Opportunity Fund, which included the census blocks identified in Exhibit 1.

5. On January 10, 2024, Commnet and Rock Island entered into an Assignment and Assumption Agreement, under which Commnet agreed to assign its RDOF obligations listed in Exhibit 1 to Rock Island, and Rock Island agreed to accept those funds and assume those obligations, subject to any required regulatory approvals. Commnet and Rock Island have agreed to work together to effectuate the assignment of Commnet’s RDOF program obligations to Rock Island with respect to these census blocks listed in Exhibit 1.

6. Commnet and Rock Island submitted a Joint Application dated February 14, 2024 to the FCC, seeking FCC consent for the assignment of Commnet’s domestic Section 214 authorization to Rock Island, which consists of Commnet’s RDOF support obligations for its designated census blocks in San Juan County, which are listed in Exhibit 1. A copy of the Joint

Application is attached at **Exhibit 2**.

7. On March 18, 2024, Rock Island filed its Application with the Commission seeking approval of its ETC designation in the census blocks in San Juan County, which are listed in Exhibit 1, where Commnet is currently authorized to receive RDOF support.

8. Following all regulatory approvals, and upon assignment, Rock Island will begin to receive RDOF funds for the transferred areas and assume Commnet's obligations to provide services pursuant to FCC rules.

9. Federal law authorizes relinquishment by one ETC where another ETC serves the area. 47 U.S.C. § 214(e)(4) states, in pertinent part:

A State commission . . . shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation shall give advance notice the State commission . . . of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier, the State commission . . . shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier. The State commission . . . shall establish a time, not to exceed one year after the State commission . . . approves such relinquishment under this paragraph, within which such purchase or construction shall be completed.

10. The FCC rules support approval of Commnet's requested ETC relinquishment. 47 C.F.R. § 54.205 provides that a "state commission shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier." 47 C.F.R. § 54.205(a).

11. Once Rock Island's Application pending before the Commission, and the Joint Application pending before the FCC, are both approved, the necessary criteria for relinquishment will be satisfied.

THEREFORE, based on the foregoing, Commnet respectfully requests the Commission issue an order granting its request for relinquishment, conditioned upon the FCC's approval of the Joint Application and the Commission's approval of Rock Island's Application seeking ETC designation in the census blocks listed in Exhibit 1.

Respectfully submitted this 21<sup>st</sup> day of August, 2024.

Commnet Wireless LLC



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Warren Thomas  
Vice President and General Counsel  
Commnet Wireless LLC

## EXHIBIT 1

Count	Applicant Name	FRN	State	County	Census Block	Census Block Group
1	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002007	530559603002
2	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002010	530559603002
3	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002011	530559603002
4	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002012	530559603002
5	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002013	530559603002
6	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002015	530559603002
7	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002016	530559603002
8	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002017	530559603002
9	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002018	530559603002
10	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002019	530559603002
11	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002020	530559603002
12	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002025	530559603002
13	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002026	530559603002
14	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002027	530559603002
15	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002030	530559603002
16	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002032	530559603002
17	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002033	530559603002
18	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002034	530559603002
19	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002035	530559603002
20	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002036	530559603002
21	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603002041	530559603002
1	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004004	530559603004
2	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004014	530559603004
3	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004018	530559603004
4	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004022	530559603004
5	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004049	530559603004
6	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004055	530559603004
7	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004056	530559603004
8	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004060	530559603004
9	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004061	530559603004
10	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004063	530559603004
11	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004064	530559603004
12	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004065	530559603004
13	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004067	530559603004
14	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004068	530559603004
15	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004069	530559603004
16	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004071	530559603004
17	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559603004072	530559603004



20	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001028	530559605001
21	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001029	530559605001
22	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001030	530559605001
23	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001031	530559605001
24	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001032	530559605001
25	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001034	530559605001
26	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001036	530559605001
27	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001046	530559605001
28	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001048	530559605001
29	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001049	530559605001
30	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001050	530559605001
31	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001053	530559605001
32	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001054	530559605001
33	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001055	530559605001
34	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001061	530559605001
35	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001062	530559605001
36	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001063	530559605001
37	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001075	530559605001
38	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001104	530559605001
39	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001105	530559605001
40	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001113	530559605001
41	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001114	530559605001
42	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001115	530559605001
43	Commnet Wireless, LLC	0007116403	Washington	San Juan	530559605001116	530559605001

**EXHIBIT 2**