

**BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI**

Petition of PD Fiber, LLC ) Case No. [        ]  
For Designation as An Eligible )  
Telecommunications Carrier Pursuant to )  
Section 214(e)(2) of the Communications )  
Act of 1934, as Amended )

**PETITION OF PD FIBER, LLC  
FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

COMES NOW PD Fiber, LLC (“Petitioner”), pursuant to § 214(e)(2) of the Communications Act of 1934 (“Act”), as amended, and the rules and regulations of the Missouri Public Service Commission (“Commission”), including 4 CSR § 240-2.060 and 4 CSR §§ 240-31.015-0.16 to respectfully request designation as both a High-Cost and Low-Income Eligible Telecommunications Carrier (“ETC”) in the State of Missouri in all areas where Petitioner, through its participation in the Rural Electric Cooperative Consortium, has been allocated Rural Digital Opportunity (“RDOF”) Phase I support as a winner in the Federal Communications Commission’s (“FCC”) RDOF Phase I auction (“Auction 904”), as well as Lifeline-only ETC designation in additional areas of Missouri.

Petitioner is obligated to obtain ETC designation status within 180 days of the announcement by the FCC that Petitioner was a winning bidder in the RDOF Phase I auction in the census blocks in which Petitioner was awarded RDOF Phase I support<sup>1</sup> and requests expeditious action by the Commission so that it may meet this requirement.

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<sup>1</sup> 47 C.F.R. § 54.804(b)(5).

## **I. INTRODUCTION AND SUMMARY**

Petitioner is a wholly-owned subsidiary of Pemiscot-Dunklin Electric Cooperative, Inc. (“Pemiscot-Dunklin Electric Cooperative”), a non-profit, rural electric cooperative organized and existing under the laws of the State of Missouri engaged in the distribution of electric energy and service to its members within the Missouri counties of Pemiscot, Dunklin, and New Madrid.

Petitioner, a Missouri Limited Liability Company, was formed to assist with the deployment and operation of a new state-of-the-art, low-latency, fiber-to-the-home (“FTTH”) network and to provide high-speed broadband Internet access and Voice over Internet Protocol (“VoIP”) services to its service area which largely lacks access to such services.

Petitioner will offer low-latency broadband service at actual speeds of at least 1 Gigabit per second downstream and 500 Mbps upstream and offer at least 2 terabytes of monthly usage and will provide its customers with voice grade access to the Public Switched Telephone Network (“PSTN”) through its provision of interconnected VoIP service.

The street and mailing address of Petitioner’s principal office is: 2801 W. State Highway 84; Bragg City, Missouri 63827. Petitioner’s electronic mail address is: jack@pemdunk.com. Petitioner’s telephone number is (573) 757-6641 and its fax number is (573) 757-6656.

Correspondence, communications, orders and decisions in regard to this Application should be directed to:

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Interim General Manager  
PD Fiber, LLC  
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With a copy to:

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Petitioner will deploy broadband and interconnected VoIP services throughout the RDOF Phase I-eligible census blocks identified in **Exhibit A1** hereto and seeks ETC designation from the Commission to serve these census blocks. In addition, Petitioner seeks Lifeline-only ETC designation status in the additional service areas identified in **Exhibit A2**. Petitioner meets all of the requirements for ETC designation.

Designating Petitioner as an ETC to receive RDOF Phase I support, as well as federal Lifeline support, in the census blocks identified in Exhibits A1 and A2 will serve the public interest by enabling Petitioner to provide subsidized broadband and voice services to consumers and businesses in the Petitioner's proposed ETC designation area.

## **II. THE COMMISSION HAS AUTHORITY TO GRANT THE ETC DESIGNATION REQUESTED BY PETITIONER**

Section 214(e)(2) of the Act gives authority to State commissions to designate a common carrier as an ETC. Under Missouri regulations, “[a]ny company seeking [ETC] status for the purpose of participating in the federal Universal Service Fund (USF) high cost programs ... shall apply for ETC designation with the Commission.”<sup>2</sup> An ETC is defined as “a carrier designated as such by the Missouri Public Service Commission pursuant to 47 U.S.C. 214(e) and 47 CFR Part 54 Subpart C.”<sup>3</sup>

## **III. PETITIONER MEETS THE FEDERAL STATUTORY AND REGULATORY PREREQUISITES TO BE DESIGNATED AS AN ETC**

As demonstrated herein, Petitioner satisfies each of the state and federal statutory and regulatory requirements to be an ETC.

### **A. Petitioner Will Provide Service as a Common Carrier**

Petitioner will provide its services on a common carrier basis. As such, Petitioner certifies that it is a common carrier under §§ 214(e)(1)-(2) of the Act.<sup>4</sup>

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<sup>2</sup> 4 CSR § 240-31.016.

<sup>3</sup> 4 CSR § 240-31.010(5).

<sup>4</sup> See Exhibit B (Affidavit of Jack L. Davis)

**B. Petitioner Will Offer the Services Supported by the Federal Universal Service Support Mechanisms**

As described below, Petitioner certifies that it will provide the following services that are supported by federal universal service support mechanisms:<sup>5</sup>

1. **Voice Grade Access to the PSTN** – Petitioner will meet this requirement through the provision of IP-based voice communications service that is interconnected to the PSTN. Petitioner will be legally responsible for dealing with customer problems, providing quality of service guarantees, and meeting universal service-related requirements. Petitioner will offer stand-alone voice telephony service throughout its proposed ETC designation area and will offer such service at rates that are reasonably comparable to urban rates. This service will include minutes of use for local service provided at no charge to end users and access to emergency service via E-911, wherever available from local government or public safety organizations.<sup>6</sup> Petitioner also commits to provide toll limitation services to qualifying low-income consumers as provided in §§ 54.400-54.423 of the Rules.<sup>7</sup>
2. **Broadband Internet Access Services** – Petitioner’s broadband Internet offering will provide the capability to transmit data to and receive data by wire from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service. Petitioner will offer low-latency Internet service at actual speeds of at least 1 Gbps downstream and 500 Mbps upstream and offer at least 2 terabytes of monthly usage throughout its proposed ETC designation area, and will offer such service at rates that are reasonably comparable to urban rates.<sup>8</sup>
3. **Lifeline Service** – Petitioner will offer subsidized Lifeline voice and broadband services, including a standalone voice service offering, to qualifying low-income consumers in accordance with the FCC’s rules within its proposed ETC designation area.<sup>9</sup>

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<sup>5</sup> *See id.*

<sup>6</sup> 47 C.F.R. § 54.101(a)(1) and (b).

<sup>7</sup> 47 C.F.R. § 54.101(a)(1).

<sup>8</sup> 47 C.F.R. § 54.101(a)(2).

<sup>9</sup> 47 C.F.R. § 54.405(a), 54.400 *et. seq.*

Petitioner further commits to provide these services consistent with the applicable FCC high-cost universal service support rules.<sup>10</sup>

**C. Petitioner Will Provide Service Using Its Own Facilities**

Petitioner will deploy and operate a state-of-the-art, low-latency, FTTH facilities-based network to provide high-speed broadband Internet access and interconnected VoIP services to those within its proposed ETC designation area who lack access to such services.<sup>11</sup>

**D. Petitioner Will Provide the Requisite RDOF Phase I Supported Services Throughout the Proposed ETC Designation Area**

Petitioner commits to providing the supported services throughout its proposed ETC designation area, consistent with all applicable requirements.<sup>12</sup>

**E. Petitioner Will Advertise the Availability of Its Services and Charges Using Media of General Distribution**

Petitioner will advertise the availability of and charges for its supported service offerings using media of general distribution, and will undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements.<sup>13</sup> Petitioner will offer and advertise its broadband and interconnected VoIP services through a combination of media channels, such as newspaper, magazines, and other print advertisements, outdoor advertising, direct marketing, and/or the Internet. Petitioner will advertise its universal service offerings in a manner consistent with applicable requirements.

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<sup>10</sup> See 47 C.F.R. §§ 54.101 and 54.201.

<sup>11</sup> 47 C.F.R. § 54.201(d)(1).

<sup>12</sup> See 47 C.F.R. §§ 54.101 and 54.201.

<sup>13</sup> 47 C.F.R. § 54.201(d)(2).

**F. Petitioner Possesses the Financial and Technical Capability to Provide the Supported Services**

With the financial backing of its parent, Pemiscot-Dunklin Electric Cooperative, Petitioner possesses the financial and technical capabilities to pay for all start-up expenses (*e.g.*, construction, hardware, operations, etc.) to get its fiber optic network built and to begin the provision of voice and broadband services throughout its proposed ETC designation area. Petitioner and/or Pemiscot-Dunklin Electric Cooperative will be able to obtain the requisite amount of lending under its existing lines of credit and Petitioner and/or Pemiscot-Dunklin Electric Cooperative is able to obtain additional financing, if necessary, in addition to the RDOF Phase I support being made available to Petitioner.

**G. Petitioner Will Meet the Additional FCC Requirements for Designation as an ETC**

Petitioner further certifies that it will meet all of the FCC's requirements for designation as an ETC under § 214(e)(2) of the Act.<sup>14</sup>

1. **Compliance with Applicable Service and Performance Quality Requirements.** Petitioner certifies that it will comply with the service requirements applicable to the support that it receives, including the requirements for RDOF Phase I support, and will provide additional information in this regard as part of its FCC Form 683 application, including a certification from a professional engineer that the fiber optic network is capable of delivering voice and broadband service that meets the requisite performance requirements and sufficient capacity to meet customer demand at or above the prescribed levels during peak usage periods.<sup>15</sup>

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<sup>14</sup> See Exhibit B.

<sup>15</sup> See 47 C.F.R. § 54.309.

2. **Ability to Remain Functional in Emergency Situations.** Petitioner certifies that its fiber optic network will have the ability to remain functional in emergency situations, will have a reasonable amount of back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities and will be capable of managing traffic spikes resulting from emergency situations.<sup>16</sup> Petitioner's fiber optic network will support telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including E-911 services.

#### **IV. PETITIONER MEETS THE STATE REQUIREMENTS TO BE DESIGNATED AS AN ETC**

Petitioner is in good standing under the laws of Missouri.<sup>17</sup> Petitioner does not have any pending action or final unsatisfied judgment or decisions against it from any state or federal agency or court which involves customer service or rates within three (3) years of the date of this petition.<sup>18</sup> Petitioner does not have any annual reports or assessment fees that are overdue.<sup>19</sup>

Petition complies with the ETC application requirements set forth in 4 CSR § 240-31-016(2)(B) as follows:

- Petitioner is a wholly owned subsidiary of Pemiscot-Dunklin Electric Cooperative, which, in turn, is owned by its members. No individual or entity has more than a 10% ownership interest in Pemiscot-Dunklin Electric Cooperative.
- The officers and directors of Petitioner are listed in **Exhibit D.**
- No company sharing common ownership and management with Petitioner has ever received funds from the federal USF or any state universal service fund.
- No matter has been brought in the last ten (10) years by any state or federal regulatory or law enforcement agency against any of the individuals, entities, managers, officers and/or directors of other companies sharing common

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<sup>16</sup> See 47 C.F.R. § 54.202(a)(2).

<sup>17</sup> 4 CSR § 240-2.060(B).

<sup>18</sup> 4 CSR § 240-2.060(K).

<sup>19</sup> 4 CSR § 240-2.060(L).



ownership or management with the applicant involving fraud, deceit, perjury, stealing, or the omission or misstatement of material fact in connection with a commercial transaction.

- Petitioner’s website will contain information about its service and rates prior to the initiation of such service.
- Petitioner will comply with the ETC requirements identified in 4 CSR 240-31.015.
- Petitioner will notify the Commission of any changes to its contact information.

## **V. GRANT OF THIS APPLICATION WILL SERVE THE PUBLIC INTEREST**

The grant of this Petition will clearly serve the public interest by enabling Petitioner to provide low-latency, gigabit-speed broadband, and interconnected VoIP-based voice services to residents in its proposed ETC designation area, as well as to provide subsidized voice and broadband services to those households that seek and qualify for federal Lifeline benefits. Petitioner’s participation will “encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans ...,”<sup>20</sup> and will ensure that federal universal service support, including RDOF Phase I support, is used efficiently and effectively.

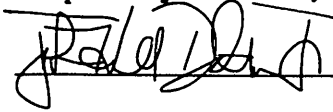
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<sup>20</sup> 47 U.S.C. § 1302(a).

**VI. CONCLUSION**

For all of the foregoing reasons, Petitioner respectfully requests that the Commission designate it as both a High-Cost and Low-Income ETC so that Petitioner will be eligible to receive the RDOF Phase I support it has been awarded in Auction 904, as well as federal Lifeline support throughout its proposed ETC designation area.

Respectfully submitted,



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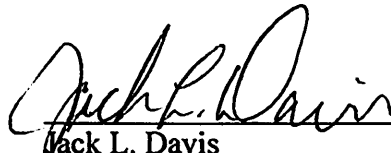
*Counsel to PD Fiber, LLC*

Dated: January 04, 2021

**VERIFICATION**

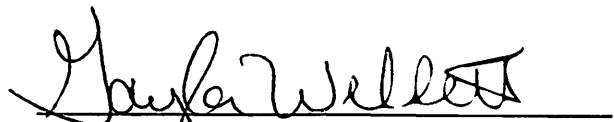
STATE OF MISSOURI            )  
  )  
COUNTY OF PEMISCOT        )        ss

I, Jack L. Davis, state that I am the Interim General Manager of PD Fiber, LLC; that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of PD Fiber, LLC.

  
\_\_\_\_\_  
Jack L. Davis  
Interim General Manager  
PD Fiber, LLC

Subscribed and sworn to before me this 4<sup>th</sup> day of January 2020.



  
\_\_\_\_\_  
Notary Public

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing Petition was served by electronic mail or U.S. Mail, postage prepaid, this 4<sup>th</sup> day of January 2021 upon the following:

Office of the Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, Missouri 65102  
opcservice@ded.mo.gov

Missouri Public Service Commission  
Staff Counsel Department  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, Missouri 65102  
staffcounsel@psc.mo.gov

  
John H. Dalton Jr.

**EXHIBIT A1**

**LIST OF CENSUS BLOCKS IN WHICH  
PETITIONER SEEKS DESIGNATION  
AS A HIGH COST AND LOW-INCOME (LIFELINE)  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

290693604002001	290693604003044	290693608001032	290693608001222
290693604002009	290693604003046	290693608001033	290693608001228
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291439604002089	291439604002324	291439605001119	291439605001251
291439604002091	291439604002325	291439605001120	291439605001254
291439604002092	291439604002334	291439605001121	291439605001255
291439604002095	291439604002336	291439605001123	291439605001258
291439604002098	291439604002337	291439605001125	291439605001259
291439604002099	291439604002338	291439605001126	291439605001260
291439604002100	291439604002355	291439605001128	291439605001261

291439605001262	291554701001128	291554701002045	291554701002157
291439605001264	291554701001135	291554701002046	291554701002171
291439605001265	291554701001145	291554701002047	291554701002172
291439605001271	291554701001148	291554701002048	291554701002186
291439605001278	291554701001149	291554701002051	291554701002187
291439605001284	291554701001150	291554701002052	291554701002190
291439605001285	291554701001152	291554701002053	291554701002192
291439605001292	291554701001157	291554701002055	291554701002209
291439605001293	291554701001158	291554701002056	291554701002210
291439606001000	291554701001160	291554701002060	291554701002218
291439606001001	291554701001161	291554701002061	291554701002220
291439606001002	291554701001167	291554701002062	291554701002240
291439606001015	291554701001168	291554701002063	291554701002241
291439606001043	291554701001171	291554701002064	291554701002247
291439606002001	291554701001173	291554701002065	291554701002259
291439606002002	291554701001177	291554701002066	291554701002260
291439606002006	291554701001179	291554701002067	291554701002263
291439606002007	291554701001180	291554701002068	291554701003003
291439606002008	291554701001183	291554701002069	291554701003004
291439606002009	291554701001185	291554701002071	291554701003026
291439606002018	291554701001191	291554701002075	291554701003028
291554701001000	291554701001192	291554701002076	291554701003029
291554701001008	291554701001193	291554701002078	291554701003030
291554701001009	291554701001196	291554701002080	291554701003031
291554701001019	291554701001205	291554701002081	291554701003035
291554701001020	291554701001214	291554701002083	291554701003036
291554701001059	291554701001215	291554701002084	291554701003039
291554701001062	291554701001223	291554701002085	291554701003043
291554701001063	291554701001226	291554701002089	291554701003047
291554701001071	291554701001229	291554701002090	291554701003053
291554701001072	291554701001230	291554701002093	291554701003054
291554701001073	291554701001237	291554701002094	291554701003055
291554701001074	291554701001238	291554701002096	291554701003057
291554701001083	291554701001241	291554701002099	291554701003058
291554701001088	291554701002000	291554701002100	291554701003059
291554701001089	291554701002002	291554701002101	291554701003061
291554701001090	291554701002018	291554701002102	291554701003066
291554701001092	291554701002019	291554701002108	291554701003067
291554701001107	291554701002021	291554701002109	291554701003068
291554701001111	291554701002022	291554701002111	291554701003069
291554701001118	291554701002027	291554701002134	291554701003070
291554701001119	291554701002028	291554701002135	291554701003072
291554701001124	291554701002041	291554701002142	291554701003073
291554701001127	291554701002044	291554701002155	291554701003074



291554701003077	291554705001116	291554705002041	291554705002190
291554701003097	291554705001124	291554705002042	291554705002191
291554702001018	291554705001127	291554705002043	291554705002192
291554702001020	291554705001129	291554705002044	291554705002193
291554702001057	291554705001133	291554705002045	291554705002194
291554703002008	291554705001143	291554705002047	291554705002196
291554703002044	291554705001145	291554705002048	291554705002202
291554703002052	291554705001146	291554705002050	291554705002204
291554704002025	291554705001147	291554705002055	291554705002205
291554704002029	291554705001149	291554705002057	291554705002207
291554704002035	291554705001162	291554705002060	291554705002211
291554704002036	291554705001163	291554705002062	291554705002217
291554705001001	291554705001164	291554705002063	291554705002219
291554705001003	291554705001166	291554705002064	291554705002220
291554705001004	291554705001168	291554705002066	291554705002221
291554705001033	291554705001169	291554705002067	291554705002226
291554705001034	291554705001171	291554705002071	291554705003003
291554705001038	291554705001172	291554705002091	291554705003005
291554705001042	291554705001173	291554705002093	291554705003014
291554705001051	291554705001174	291554705002096	291554705003041
291554705001054	291554705001176	291554705002100	291554705003069
291554705001055	291554705001177	291554705002102	291554705003071
291554705001056	291554705001184	291554705002103	291554705003084
291554705001057	291554705001185	291554705002104	291554705003085
291554705001058	291554705001191	291554705002107	291554705003131
291554705001061	291554705001192	291554705002109	291554705003132
291554705001062	291554705001193	291554705002115	291554705003134
291554705001070	291554705001200	291554705002122	291554705003135
291554705001073	291554705001201	291554705002123	291554705003138
291554705001074	291554705001203	291554705002126	291554705003168
291554705001079	291554705001207	291554705002133	291554705003169
291554705001080	291554705001223	291554705002135	291554705003170
291554705001081	291554705001229	291554705002138	291554705003176
291554705001082	291554705002000	291554705002144	291554705003180
291554705001089	291554705002004	291554705002146	291554705003181
291554705001090	291554705002008	291554705002147	291554705003184
291554705001091	291554705002013	291554705002153	291554705003193
291554705001093	291554705002014	291554705002154	291554705003195
291554705001094	291554705002018	291554705002159	291554705003197
291554705001099	291554705002019	291554705002179	291554706001084
291554705001100	291554705002020	291554705002181	291554706001088
291554705001109	291554705002025	291554705002182	291554706001089
291554705001112	291554705002035	291554705002184	291554706001090
291554705001115	291554705002039	291554705002189	291554706001091

291554706001093

291554706001099

291554706001101

291554706001102

**EXHIBIT A2**

**LIST OF CENSUS BLOCKS IN WHICH  
PETITIONER SEEKS DESIGNATION  
SOLELY AS A LOW-INCOME (LIFELINE)  
ELIGIBLE TELECOMMUNICATIONS CARRIER**

290693603002083	290693603002186	290693604002084	290693604002150
290693603002091	290693603002188	290693604002085	290693604002151
290693603002092	290693603002191	290693604002087	290693604002152
290693603002100	290693603002194	290693604002089	290693604002153
290693603002101	290693603002195	290693604002091	290693604002162
290693603002102	290693603002197	290693604002092	290693604002163
290693603002107	290693603002199	290693604002093	290693604002168
290693603002109	290693603002201	290693604002099	290693604002173
290693603002110	290693603002205	290693604002100	290693604002178
290693603002113	290693603002206	290693604002104	290693604002180
290693603002116	290693603002224	290693604002105	290693604002182
290693603002118	290693604001096	290693604002106	290693604002184
290693603002125	290693604001120	290693604002108	290693604002187
290693603002127	290693604001124	290693604002109	290693604002190
290693603002129	290693604001126	290693604002110	290693604002191
290693603002130	290693604001128	290693604002112	290693604002192
290693603002131	290693604001199	290693604002113	290693604002193
290693603002133	290693604001212	290693604002116	290693604002194
290693603002135	290693604001213	290693604002124	290693604002195
290693603002137	290693604002000	290693604002125	290693604002196
290693603002138	290693604002003	290693604002126	290693604002199
290693603002140	290693604002004	290693604002127	290693604002200
290693603002141	290693604002005	290693604002128	290693604002205
290693603002142	290693604002008	290693604002129	290693604002206
290693603002143	290693604002020	290693604002131	290693604002208
290693603002144	290693604002021	290693604002132	290693604002209
290693603002146	290693604002025	290693604002133	290693604003054
290693603002150	290693604002027	290693604002134	290693604003059
290693603002151	290693604002028	290693604002135	290693604003064
290693603002152	290693604002032	290693604002136	290693604003066
290693603002154	290693604002035	290693604002140	290693604003075
290693603002179	290693604002036	290693604002143	290693604003079
290693603002180	290693604002039	290693604002145	290693604003083
290693603002184	290693604002075	290693604002146	290693604003090
290693603002185	290693604002082	290693604002147	290693604003094

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290693604003095	290693604003249	290693608001005	290693608001111
290693604003097	290693605001000	290693608001009	290693608001114
290693604003098	290693605001001	290693608001010	290693608001115
290693604003099	290693605001003	290693608001011	290693608001116
290693604003101	290693605001006	290693608001013	290693608001118
290693604003102	290693605001011	290693608001014	290693608001119
290693604003103	290693605001012	290693608001016	290693608001121
290693604003105	290693605001055	290693608001018	290693608001122
290693604003106	290693605003040	290693608001020	290693608001123
290693604003109	290693605003043	290693608001023	290693608001124
290693604003111	290693605003045	290693608001024	290693608001125
290693604003112	290693605003053	290693608001030	290693608001126
290693604003119	290693605003054	290693608001035	290693608001128
290693604003120	290693605003061	290693608001037	290693608001129
290693604003122	290693606001102	290693608001038	290693608001130
290693604003127	290693606001115	290693608001039	290693608001131
290693604003128	290693606001116	290693608001044	290693608001132
290693604003135	290693606003000	290693608001045	290693608001133
290693604003136	290693606003002	290693608001048	290693608001134
290693604003139	290693606003003	290693608001049	290693608001135
290693604003140	290693606003004	290693608001051	290693608001136
290693604003141	290693606003005	290693608001054	290693608001138
290693604003142	290693606004000	290693608001057	290693608001139
290693604003143	290693606004003	290693608001058	290693608001140
290693604003144	290693606004007	290693608001059	290693608001141
290693604003145	290693606004010	290693608001060	290693608001143
290693604003146	290693606004013	290693608001063	290693608001155
290693604003149	290693606004015	290693608001070	290693608001156
290693604003153	290693606004016	290693608001079	290693608001157
290693604003156	290693606004019	290693608001083	290693608001160
290693604003157	290693606004034	290693608001088	290693608001161
290693604003158	290693606004035	290693608001089	290693608001162
290693604003160	290693606004036	290693608001090	290693608001163
290693604003161	290693606004037	290693608001093	290693608001164
290693604003162	290693606004038	290693608001096	290693608001166
290693604003164	290693606004042	290693608001098	290693608001169
290693604003166	290693606004049	290693608001103	290693608001170
290693604003168	290693606004077	290693608001105	290693608001189
290693604003176	290693607001008	290693608001106	290693608001194
290693604003184	290693607001053	290693608001107	290693608001197
290693604003187	290693608001001	290693608001109	290693608001204
290693604003194	290693608001004	290693608001110	290693608001214

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290693608001216	290693608002044	290693609001056	290693609001219
290693608001221	290693608002046	290693609001058	290693609001223
290693608001226	290693608002047	290693609001065	290693609001224
290693608001227	290693608002048	290693609001068	290693609001225
290693608001235	290693608002049	290693609001069	290693609001229
290693608002000	290693608002050	290693609001072	290693609001230
290693608002001	290693608002051	290693609001076	290693609002003
290693608002002	290693608002054	290693609001079	290693609002044
290693608002003	290693608002055	290693609001122	290693609002045
290693608002005	290693608002057	290693609001123	290693609002046
290693608002006	290693608002058	290693609001126	290693609002047
290693608002007	290693608002059	290693609001127	290693609002054
290693608002008	290693608002060	290693609001136	290693609002056
290693608002009	290693608002062	290693609001161	290693609002057
290693608002010	290693608002065	290693609001162	290693609002058
290693608002011	290693609001001	290693609001163	290693609002059
290693608002012	290693609001003	290693609001166	290693609002063
290693608002013	290693609001005	290693609001167	290693609002064
290693608002016	290693609001006	290693609001168	290693609002065
290693608002017	290693609001008	290693609001170	290693609002066
290693608002018	290693609001009	290693609001178	290693609002067
290693608002020	290693609001010	290693609001180	290693609002071
290693608002021	290693609001011	290693609001181	290693609002075
290693608002022	290693609001012	290693609001182	290693609002085
290693608002023	290693609001013	290693609001192	290693609002107
290693608002024	290693609001015	290693609001193	290693609002108
290693608002025	290693609001016	290693609001194	290693609002111
290693608002026	290693609001018	290693609001195	290693609002112
290693608002027	290693609001019	290693609001196	290693609002113
290693608002028	290693609001023	290693609001199	290693609002118
290693608002029	290693609001024	290693609001201	290693609002120
290693608002030	290693609001027	290693609001203	290693609002121
290693608002031	290693609001031	290693609001204	290693609002122
290693608002032	290693609001032	290693609001205	290693609002138
290693608002033	290693609001033	290693609001207	290693609002147
290693608002034	290693609001036	290693609001208	290693609002152
290693608002035	290693609001041	290693609001209	290693609002153
290693608002036	290693609001045	290693609001211	290693609002155
290693608002037	290693609001049	290693609001212	290693609002162
290693608002038	290693609001051	290693609001216	290693609002169
290693608002041	290693609001054	290693609001217	290693609002171
290693608002042	290693609001055	290693609001218	290693609002179

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290693609002180	290693609003059	290693610001102	290693610001232
290693609002188	290693609003060	290693610001104	290693610001233
290693609002195	290693609003062	290693610001110	290693610001234
290693609002196	290693609003063	290693610001115	290693610001235
290693609002198	290693609003064	290693610001124	290693610001236
290693609002199	290693609003065	290693610001125	290693610001237
290693609002206	290693609003067	290693610001127	290693610001238
290693609002217	290693609003070	290693610001128	290693610001244
290693609002225	290693609003072	290693610001131	290693610001245
290693609002231	290693609003073	290693610001133	290693610001248
290693609002264	290693609003074	290693610001134	290693610002000
290693609003000	290693610001007	290693610001138	290693610002001
290693609003001	290693610001015	290693610001150	290693610002003
290693609003003	290693610001020	290693610001154	290693610002004
290693609003007	290693610001022	290693610001162	290693610002005
290693609003008	290693610001026	290693610001164	290693610002006
290693609003011	290693610001027	290693610001169	290693610002007
290693609003012	290693610001033	290693610001170	290693610002010
290693609003018	290693610001035	290693610001173	290693610002011
290693609003020	290693610001036	290693610001174	290693610002012
290693609003021	290693610001038	290693610001175	290693610002013
290693609003022	290693610001039	290693610001176	290693610002014
290693609003023	290693610001042	290693610001179	290693610002015
290693609003024	290693610001043	290693610001181	290693610002018
290693609003025	290693610001044	290693610001185	290693610002019
290693609003030	290693610001053	290693610001187	290693610002020
290693609003031	290693610001055	290693610001188	290693610002021
290693609003032	290693610001058	290693610001191	290693610002024
290693609003036	290693610001059	290693610001195	290693610002028
290693609003037	290693610001065	290693610001203	290693610002030
290693609003038	290693610001068	290693610001208	290693610002031
290693609003039	290693610001070	290693610001210	290693610002032
290693609003043	290693610001076	290693610001212	290693610002033
290693609003046	290693610001077	290693610001213	290693610002034
290693609003048	290693610001078	290693610001215	290693610002035
290693609003050	290693610001084	290693610001218	290693610002036
290693609003051	290693610001088	290693610001220	290693610002037
290693609003052	290693610001089	290693610001222	290693610002038
290693609003053	290693610001091	290693610001223	290693610002039
290693609003054	290693610001092	290693610001224	290693610002040
290693609003055	290693610001093	290693610001229	290693610002041
290693609003056	290693610001094	290693610001230	290693610002044

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290693610002045	291439604002069	291439604002268	291439605001205
290693610002046	291439604002073	291439604002270	291439605001207
290693610002048	291439604002078	291439604002271	291439605001213
290693610002049	291439604002084	291439604002272	291439605001231
290693610002050	291439604002124	291439604002273	291439605001233
290693610002051	291439604002127	291439604002294	291439605001235
290693610002054	291439604002135	291439604002297	291439605001236
290693610002056	291439604002138	291439604002301	291439605001237
290693610002059	291439604002140	291439604002302	291439605001244
290693610003000	291439604002144	291439604002303	291439605001252
290693610003001	291439604002147	291439604002306	291439605001273
290693610003002	291439604002148	291439604002308	291439605001276
290693610003003	291439604002149	291439604002313	291439605001279
290693610003005	291439604002152	291439604002316	291439605001282
290693610003006	291439604002157	291439604002320	291439605001283
290693610003007	291439604002158	291439604002326	291439605001289
290693610003009	291439604002163	291439604002372	291439605002074
290693610003010	291439604002164	291439604003002	291439605002093
290693610003011	291439604002165	291439604003005	291439605002094
290693610003013	291439604002166	291439604003007	291439605002095
290693610003014	291439604002174	291439604003015	291439605002174
290693610003015	291439604002177	291439604003063	291439605002175
290693610003016	291439604002178	291439605001007	291439605002181
290693610003019	291439604002179	291439605001013	291439605002186
290693610003020	291439604002181	291439605001020	291439605003000
290693610003022	291439604002193	291439605001023	291439605003006
290693610003023	291439604002205	291439605001033	291439605003007
290693610003024	291439604002218	291439605001067	291439605003008
290693610003025	291439604002220	291439605001112	291439605003009
290693610003030	291439604002221	291439605001113	291439605003027
290693610003031	291439604002223	291439605001131	291439605003029
290693610003032	291439604002224	291439605001132	291439605003030
290693610003033	291439604002228	291439605001136	291439605003031
290693610003034	291439604002229	291439605001141	291439605003037
290693610003035	291439604002233	291439605001151	291439605003091
290693610003039	291439604002235	291439605001153	291439606001032
290693610003042	291439604002243	291439605001164	291439606002003
290693610003043	291439604002261	291439605001165	291439606002004
291439602003006	291439604002263	291439605001166	291439606002012
291439604002022	291439604002264	291439605001173	291439606002013
291439604002059	291439604002265	291439605001190	291439606002019
291439604002060	291439604002267	291439605001198	291439606002020

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291439606003001	291554701001172	291554701003000	291554705001111
291439606003002	291554701001181	291554701003001	291554705001122
291439606003003	291554701001182	291554701003002	291554705001132
291439606003005	291554701001216	291554701003022	291554705001157
291554701001003	291554701001219	291554701003024	291554705001158
291554701001005	291554701001227	291554701003025	291554705001170
291554701001006	291554701001249	291554701003046	291554705001180
291554701001010	291554701001252	291554701003049	291554705001186
291554701001011	291554701002003	291554701003071	291554705001187
291554701001012	291554701002010	291554701003095	291554705001188
291554701001013	291554701002017	291554701003096	291554705001194
291554701001014	291554701002023	291554701003098	291554705001197
291554701001016	291554701002024	291554701003099	291554705001198
291554701001018	291554701002025	291554702001002	291554705001202
291554701001032	291554701002031	291554702001003	291554705001204
291554701001033	291554701002032	291554702001021	291554705001226
291554701001034	291554701002033	291554702001024	291554705001228
291554701001035	291554701002034	291554702001025	291554705002046
291554701001037	291554701002038	291554702001026	291554705002049
291554701001038	291554701002039	291554702001028	291554705002065
291554701001049	291554701002049	291554702001030	291554705002068
291554701001057	291554701002050	291554702001031	291554705002069
291554701001060	291554701002058	291554702001058	291554705002078
291554701001061	291554701002077	291554702003030	291554705002094
291554701001069	291554701002092	291554702003031	291554705002095
291554701001070	291554701002098	291554702003067	291554705002108
291554701001078	291554701002105	291554703001025	291554705002113
291554701001079	291554701002106	291554703001031	291554705002118
291554701001080	291554701002107	291554703002049	291554705002121
291554701001082	291554701002112	291554703002050	291554705002130
291554701001084	291554701002113	291554703002055	291554705002139
291554701001091	291554701002114	291554703002056	291554705002140
291554701001093	291554701002158	291554704002026	291554705002148
291554701001101	291554701002168	291554704002037	291554705002149
291554701001102	291554701002173	291554705001019	291554705002150
291554701001106	291554701002177	291554705001020	291554705002151
291554701001114	291554701002212	291554705001077	291554705002152
291554701001116	291554701002235	291554705001078	291554705002155
291554701001117	291554701002236	291554705001083	291554705002156
291554701001123	291554701002237	291554705001087	291554705002158
291554701001125	291554701002238	291554705001095	291554705002160
291554701001130	291554701002266	291554705001110	291554705002161

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291554705002165	291554705003030	291554705003067	291554705003200
291554705002167	291554705003035	291554705003073	291554705003206
291554705002176	291554705003037	291554705003074	291554705003208
291554705002177	291554705003038	291554705003078	291554706001000
291554705002178	291554705003039	291554705003079	291554706001007
291554705002185	291554705003040	291554705003080	291554706001012
291554705002186	291554705003043	291554705003081	291554706001022
291554705002210	291554705003045	291554705003086	291554706001025
291554705002227	291554705003046	291554705003087	291554706001026
291554705003000	291554705003047	291554705003088	291554706001030
291554705003002	291554705003048	291554705003089	291554706001041
291554705003004	291554705003049	291554705003090	291554706001046
291554705003008	291554705003050	291554705003091	291554706001048
291554705003011	291554705003051	291554705003093	291554706001072
291554705003012	291554705003053	291554705003129	291554706001078
291554705003020	291554705003054	291554705003130	291554706001082
291554705003021	291554705003055	291554705003136	291554706001086
291554705003022	291554705003056	291554705003137	291554706001094
291554705003023	291554705003057	291554705003139	291554706001095
291554705003026	291554705003061	291554705003162	291554706001097
291554705003027	291554705003062	291554705003166	291554706001098
291554705003028	291554705003064	291554705003172	291554706002000
291554705003029	291554705003065	291554705003187	291554706002033

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**EXHIBIT B**

**AFFIDAVIT OF JACK L. DAVIS**

Jack L. Davis, 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 the Interim General Manager of PD Fiber, LLC. 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 my belief.
3. Petitioner certifies that it is a common carrier under §§ 214(e)(1)-(2) of the Communications Act of 1934, as amended ("Act").
4. Petitioner commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier ("ETC") in the census blocks in which Petitioner was an RDOF Phase I auction winning bidder.
5. Petitioner certifies that it will meet all of the FCC's requirements for designation as an ETC under § 214(e)(1) of the Act, and all of the Commission's requirements for designation as an ETC.
6. Applicant is eligible to be designated as an ETC within the meaning of Section 214(e) of the Act and is eligible to receive federal universal service support pursuant to Section 254(e) of the Act.
7. Petitioner will use the federal high-cost support funds that it receives only to provide, deploy, upgrade and/or maintain facilities and services for which the support is intended.

*Jack L. Davis*

Jack L. Davis  
Interim General Manager  
PD Fiber, LLC



STATE OF MISSOURI            )  
  )  
COUNTY OF PEMISCOT        )        ss

Subscribed and sworn to before me this 4<sup>th</sup> day of January, 2020.

*Gayla Willett*  
Notary Public

**EXHIBIT C**

**CERTIFICATE OF GOOD STANDING**

# STATE OF MISSOURI



John R. Ashcroft  
Secretary of State

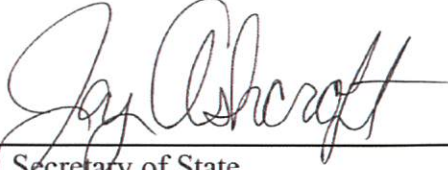
## CERTIFICATE OF GOOD STANDING

I, John R. Ashcroft, Secretary of State of the STATE OF MISSOURI, do hereby certify that the records in my office and in my care and custody reveal that

**PD Fiber, LLC**  
**LC001548267**

A Missouri entity was created under the laws of this State on 7/21/2017, and is Active, having fully complied with all the requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri.  
Done at the City of Jefferson, the 4th day of January, 2021.

  
Secretary of State

Certification Number: CERT-IN47160

