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July 9, 2021

Via Federal Express

Louisiana Public Service Commission
Records Division
Brandon Frey, Executive Secretary
602 N. Fifth Street, 12th Floor
Baton Rouge, LA 70802

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LA Public Service Commission

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JUL 12 2021

LA Public Service Commission

Re: Petition of NTS Communications, LLC d/b/a Vexus Fiber for Designation as an Eligible
Telecommunications Carrier and Request for Expedited Consideration

Dear Brandon:

Please find enclosed an original and two (2) copies of the referenced application for our client, NTS Communications, LLC d/b/a Vexus Fiber. Please date stamp the enclosed extra copy of this filing and return it to us in the self-addressed and postage pre-paid return envelope. If there are any questions regarding this filing, please do not hesitate to contact me or my assistant, Breanna Bennett, via email bbennett@joneswalker.com.

Sincerely,

J. Andrew Gipson

JAG/bb

Enclosure

ROUTE TO	<i>Bull-15 day</i>	ROUTE FROM
DEPT. <u>Bull-15 day</u>	DATE <u>7/12</u>	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____
DEPT. _____	DATE _____	DEPT. _____

{JX483810.1}

Jones

BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION

**NTS COMMUNICATIONS, LLC
D/B/A VEXUS FIBER**

DOCKET NO. _____

**IN RE: PETITION OF NTS COMMUNICATIONS, LLC D/B/A VEXUS FIBER
 FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
 CARRIER PURSUANT TO SECTION 214(e) OF THE
 COMMUNICATIONS ACT OF 1934 AND REQUEST FOR EXPEDITED
 CONSIDERATION**

PETITION OF NTS COMMUNICATIONS, LLC D/B/A VEXUS FIBER

EXPEDITED TREATMENT REQUESTED

NTS Communications, LLC d/b/a Vexus Fiber (“Vexus”), through undersigned counsel, hereby submits this request to the Louisiana Public Service Commission (“Commission”), pursuant to Section 214(e) of the Federal Communications Act of 1934, 47 U.S.C. §214(e), for designation of Vexus as an Eligible Telecommunications Carrier (“ETC”) in its study area/census block groups for the purpose of receiving financial support from federal programs designed to support expansion of broadband service in unserved and underserved areas in Louisiana including through immediate access to the federal Lifeline program and through potential future high cost programs for which Vexus may apply.

As demonstrated in this ETC Petition, designation of Vexus as an ETC is consistent with the purposes and requirements of Section 214(e), will meet the goals of the federal Universal Service Program, and is in the public interest. Vexus' designation as an ETC in its study/census block group areas will facilitate its participation in federal funding programs designed to expand broadband service offerings to unserved and underserved areas in Louisiana, and to enhance provision of service to qualifying low-income consumers throughout Louisiana.

This ETC Petition is being filed as a requirement for Vexus to be eligible to participate in and receive funding through various low-income and high cost universal service programs funded through the Universal Service Administrative Company, as well as potential future federal reverse auction programs supporting the deployment and expansion of broadband services. Therefore, Vexus requests expedited consideration and approval of this Petition.

I. INTRODUCTION

A. Vexus' Background Information

Vexus is a certificated provider of competitive local exchange and long distance services in Louisiana by virtue of Certificate TSP00443-A to provide these services. In addition, Vexus serves as a provider of Fiber-Optic Internet, Digital TV and Phone Service, all delivered over a pure fiber network in the Hammond, Louisiana area. Vexus also possesses a cable and video license as issued by the Louisiana Secretary of State. Although domiciled in Delaware, Vexus has provided cable television services in Louisiana for approximately 10 years. In addition to providing cable services, Vexus also provides its customers in Louisiana with high speed fiber internet and phone services. Vexus' Louisiana service area includes areas traditionally served by incumbent local exchange carriers AT&T Louisiana and AT&T Southwest, CenturyLink Communications. LLC, CenturyLink of Louisiana, LLC, and Charter Communications.

II. VEXUS' REQUEST

Vexus seeks designation as an ETC with respect to its participation in federal funding programs designed to expand broadband service offerings in unserved and underserved areas in Louisiana. As demonstrated in this Petition, designation of Vexus as an ETC for this purpose is consistent with the purposes and requirements of Section 214(e), will meet the goals of the Federal Universal Service program and is in the public interest.

JUL 12 2021

III. THE FRAMEWORK FOR CONSIDERATION OF ETC APPLICATIONS LA Public Service Commission

FTC applications are governed by the requirements of Section 214(e) of the Communications Act, and the FCC Rules set forth in 47 C.F.R. Part 54.¹ The FCC has adopted numerous guidelines for states to consider when evaluating ETC applications.² While the FCC's guidelines are not mandatory, they do provide a general framework for consideration of the issues subject to evaluation in the ETC certification process.

Pursuant to Section 214(e), state regulatory bodies are responsible for designation of ETCs unless state law does not grant such authority.³ To designate a carrier as an ETC, the state must find that the carrier:

- Will provide the services supported by the universal services program throughout its designated service area, either by using its own facilities or reselling another carrier's services; and
- Will advertise the availability of its services.⁴

The state regulatory body defines the carrier's service area through its normal processes, except in the case of rural telephone companies, whose service areas are their FCC-defined study areas.⁵ However, state regulators have the authority and latitude to grant ETC status in less than the entire study area of a rural carrier. State regulators are required by Section 214(e) to designate multiple

¹ 47 U.S.C. §214(e).

² *In the matter of Connect America Fund, Report and Order and Further Notice of Proposed Rulemaking*, 26 FCC Rcd 17663(2011).

³ A state regulatory body may not have jurisdiction over the entity requesting ETC designation, which sometimes is the case with respect to wireless carriers. Because Vexus is a certificated carrier in Louisiana, the Commission has the necessary jurisdiction to consider this Petition.

⁴ 47 U.S.C. §214(e)(1).

⁵ 47 U.S.C. §214(e)(5).

ETCs in non-rural areas if more than one carrier applies and meets the statutory standards, and are permitted to designate multiple ETCs in rural areas when they determine that doing so is in the public interest.⁶

A. Applicable Commission Orders and Regulations

As set forth in 47 USC § 214(e)(2), state Commissions are vested with the primary responsibility for designating carriers as ETCs. In connection with its review, the Commission is required to conduct a two-fold analysis prior to approving a request for designation. First, the carrier seeking designation must show it offers the nine supported universal service services and advertises the availability of said services in media of general distribution. Second, in the case of an area served by a rural telephone company, the state Commission must find that designation would be in the public interest.

In regard to the public interest determination, the Commission clearly defined its own "public interest test" in 2004⁷ by adopting the following criteria to be applied on a case-specific basis in connection with all requests for ETC designation in areas served by rural telephone carriers:

1. Benefits of increased competitive choice resulting from the designation.
2. Impact of multiple designations on the USF. Specifically, the Commission, upon the petition of any rural ILEC, shall determine if any changes by the FCC in the rules affecting how rural ILECs received Federal USF support. The Commission shall render a decision on any petition filed by a rural ILEC regarding its findings within 90 days. In the event the Commission finds the

⁶ 47 U.S.C. §214(e)(2).

⁷ Commission General Order dated May 20, 2004, Docket No. R-2784 I. In re: Establishment of public interest criteria applicable to telecommunications carriers seeking Eligible Telecommunications Carrier ("ETC") designation pursuant to 47 U.S.C. 214(e)(2) in areas served by rural telephone companies. These criteria were developed during the consideration of requests of wireless carriers seeking ETC designation in areas served by rural telephone carriers, but as noted herein, a poll of the criteria are exclusive to wireless carriers. Further, the Commission has noted that these criteria were intended to be used in consideration of high cost of ETC applications.

change has had an actual material negative impact and that decertifying a wireless ETC will mitigate such reduction in funding, the competitive ETC shall be considered to no longer be in the public interest by the Commission and shall be immediately revoked by the Commission, to the extent that revoking such certification will mitigate such reduction. Nothing herein shall impact a competitive ETC's certification in non-rural areas, if any.

3. Unique advantages and disadvantages of the competitive service offering.
4. Commitment to quality of service by the competitive provider.
5. Submission of records and documentation, on a quarterly basis, declaring the carrier's plans for use of universal service funding received as a result of the Commission's designation, including updates as to the progress of said projects.
6. For wireless carriers, compliance with the CTIA Consumer Code for Wireless Services and submission of the number of consumer complaints per 1000 mobile headsets to the Commission on a quarterly basis.
7. Information regarding the number of requests for service in the designated area that go unfulfilled and adoption of a process setting forth specific steps that will be considered if a request for service is received from a customer within the designated ETC service area, but outside the existing signal coverage area.
8. Compliance with all existing and future state and federal 911 and E-911 mandates.
9. Compliance with Section 401 B of the Commission's Regulations for Competition in the Local Telecommunications Market. For all areas serviced by a wireless ETC in which the carrier received Federal USF funds, the wireless ETC shall file retail rates with the Commission's regulations prior to implementing any such retail rates. As a condition of receiving ETC status, each wireless carrier agrees that the Commission shall have the authority to reject any retail rate

found by the Commission to be artificially low or below the wireless ETC's costs of providing service, without considering federal USF funding. Additionally, the wireless ETC shall not offer any promotion in the rural service area that it does not offer in the remainder of its service area. Lifeline and Link Up offerings will not be subject to this provision.

10. Compliance with Section 302(A) of the Commission's Regulations for Competition in the Local Telecommunications Market (annual report filings).
11. Compliance with Section 301 (A), (B) and (C) of the Commission's TSP Billing Order⁸
12. Compliance with any additional requirements established by the Commission in Docket No. R-27733.⁹
13. Conduction of a rural cream-skimming analysis.

B. FCC's Criteria for ETC Designation

The FCC has adopted guidelines to govern the state ETC designation process, essentially implementing the provisions of Section 214(e).¹⁰ The FCC also has adopted rules for its own consideration of ETC applications. These rules do not bind the states, but they do provide a general outline of issues that might also be considered in a state ETC designation proceeding. Under the most current relevant FCC criteria¹¹ an applicant must:

1. Certify that it will comply with the service requirements applicable to the support that it receives.

⁸ Commission's General Order dated July 14, 2000 issued in Docket No. U-24050 In re: Rules and regulations concerning Telecommunications Service Provider ("TSP") billing.

⁹ Commission's Docket No. R-27733 In re: Establishment of reporting requirements for Telecommunications Service Providers designated as Eligible Telecommunications Carriers ("ETCs") by the Commission has been dormant since 2006.

¹⁰ 47 C.F.R. §54.201.

¹¹ 47 C.F.R. §54.202.

2. Submit a five-year plan that describes with specificity proposed improvements or upgrades to its network throughout its proposed service area, estimating the area and population that will be served as a result of the improvements.
3. Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.
4. Demonstrate that it will satisfy applicable consumer protection and service quality standards. A commitment by wireless applicants to comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service will satisfy this requirement. Other commitments will be considered on a case-by-case basis.
5. Demonstrate that its designation as an ETC is in the public interest.

The final criterion under both Section 214(e) and the FCC's guidelines is whether designating a carrier as an ETC would serve the public interest.¹² This is consistent with the Commission's criteria. The FCC guidelines have traditionally focused on "the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering."¹³ As discussed herein, the Commission has adopted a similar focus in its public interest determinations. The FCC guidelines are intended to ensure that ETC applicants will meet the essential goals of Section 214(e); thus, an applicant that meets the FCC standards will also satisfy the statutory requirements.

IV. VEXUS SATISFIES COMMISSION AND FCC STANDARDS FOR ETC DESIGNATION

¹² 47 U.S.C. §214(e)(2).

¹³ Prior to the FCC's USF/ICC Transformation Order, these guidelines were codified at 47 C.F.R. §54.202(c). The current Public Interest Standard is now codified at 47 C.F.R. §54.202(b) but does not include this level of specificity.

A. Vexus' request is in the public interest as required by the Commission.

As noted in Section III(A), the Commission has established its own public interest criteria to be applied when considering ETC applications in rural areas. The Commission's "ETC Order", Order No. R-27841, sets forth thirteen public interest criteria to be applied on a case-specific basis in connection with all requests for ETC designation in areas served by rural telephone carriers. The Commission's ETC Order was issued in 2004. As such, it predates the current federal broadband auction procedures to expand broadband services. Nonetheless, the Commission continues to apply the requirements set forth in its ETC Order. For example, in Docket No. S-35027, the Commission Staff applied the ETC Order to Viasat Carrier Services, Inc.'s request for ETC designation following its award of funding from the CAF 11 Auction 903.¹⁴ Accordingly, Vexus herein addresses the Commission's rigorous framework to demonstrate that approval of its application is in the public interest.

1) Benefits of increased competitive choice resulting from designation.

Approval of Vexus' application will serve the public interest by facilitating its use of funding awarded through its participation in available federal funding programs. Receipt of federal funding will permit Vexus to provide qualifying low-income customers with Lifeline and also to provide broadband and voice services to certain areas of Louisiana that do not currently have access to download speeds of at least 25 Mbps. Designation of Vexus as an ETC will provide residents in those areas with an opportunity to access these service offerings. This access will serve to close the digital divide for Louisiana residents and expand economic opportunity for communities that will benefit from increased connectivity.

¹⁴ Commission's Docket No. S-35027, In Re: Petition for Designation as an Eligible Telecommunications Carrier. See Order No. S-35027 issued on August 1, 2019.

2) Impact of multiple designations on the Universal Service Fund.

Granting ETC status to Vexus will not have any significant adverse effects on the USF. Vexus seeks funding from federal programs including Lifeline and EBB for qualifying low-income consumers and the amount designated for these programs is already determined. As a result, Vexus' participation as a recipient of federal support should not adversely impact the USF.

3) Unique advantages and disadvantages of the competitive service offering.

The primary advantage to Vexus' service offering is the access to broadband service with download speeds of at least 25 Mbps broadband service in areas where such service is not available. In fact, Vexus' fiber optic networks will provide customers with access to download speeds of up to 1 Gigabyte per second (1 Gbps). Further, customers will be able to bundle their internet access, cable services and voice services into one package which will be more efficient and less costly to the customers.

4) Commitment to quality of service by the competitive provider.

Vexus has a well-established reputation in its Louisiana service areas for providing quality service. For approximately 10 years, Vexus has continued to invest capital to extend, upgrade and maintain its network platform, cable plant, and to train its staff. Vexus will utilize federal support to provide voice and broadband services via underground fiber.

5) Submission of records and documentation declaring the carrier's plans for use of universal service funding received as a result of the Commission's designation, including updates as to the progress of said projects.

Vexus commits to provide the Commission with required updates related to its plans for utilization of federal funding, including, as applicable, updates as to the progress of deployment. Vexus further commits to provide the Commission with any reports that are required in connection with its selection for any award of federal funding.

6) For wireless carriers, compliance with the CTIA Consumer Code for Wireless Services and submission of the number of consumer complaints per 1000 mobile headsets to the Commission on a quarterly basis.

This requirement does not apply to Vexus, as it is not a wireless carrier. However, because Vexus' already operates as a CLEC and Long Distance provider in Louisiana, it is currently required to submit certain reports to the Commission related to customer service matters. Vexus commits to continuing to do so should it be granted ETC status.

7) Information regarding the number of requests for service in the designated area that go unfulfilled and adoption of a process setting forth specific steps that will be considered if a request for service is received from a customer within the designated ETC service area, but outside the existing signal coverage area.

Vexus will prioritize service offerings consistent with the applicable federal support programs and anticipates requests for service in locations previously unserved and underserved. Requests for service will be received online and entered into a database. Service will be installed in a timely manner as the network is built out. This database will be used to market to customers as our network grows into additional areas.

8) Compliance with all existing and future state and federal 911 and E-911 mandates.

Vexus is a registered CLEC and long distance provider in Louisiana and has been fully compliant with both federal and state requirements for providing E-911 services to its customers since it began operation as a CLEC in Louisiana, and will continue to be fully compliant therewith if designated as an ETC.

9) Compliance with Section 401(B) of the Commission's Regulations for Competition in the Local Telecommunications Market.

Section 401(B) applies to providers of Commercial Radio Mobile Service (CMRS) and Private Mobile Radio Service (PMRS) and therefore is not applicable to Vexus' Petition.

10) Compliance with Section 302(A) of the Commission's Regulations for Competition in the Local Telecommunications Market (annual report filings).

Section 302(A) was deleted by General Order No. R-31839. dated March 11, 2014.

11) Compliance with Section 301 (A), (B) and (C) of the Commission's TSP Billing Order.¹⁵

Vexus is fully compliant with Sections 301(A), (B) and (C) of the Commission's TSP

Billing Order.

12) Compliance with any additional requirements established by the Commission in Docket No. R-27733.¹⁶

Upon information and belief, no additional ETC reporting requirements have been developed by the Commission as a result of Docket No. R-27733. Should the Commission issue an order relative to any new reporting requirements for ETCs, Vexus will commit to full compliance.

13) Conduction of a rural cream-skimming analysis.

Due to revisions to 47 C.F.R 54.202, cream-skimming considerations have been eliminated from the "public interest" standard of that provision. Thus, this criterion is not relevant to consideration of Vexus' instant application.

¹⁵ Commission's General Order dated July 14, 2000 issued in Docket No. U-24050 in re: Rules and regulations concerning Telecommunications Service Provider ("TSP") billing.

¹⁶ Commission's Docket No. R-27733 In re: Establishment of reporting requirements for Telecommunications Service Providers designated as Eligible Telecommunications Carriers ("ETC's") by the Commission has been dormant since 2006.

A. Vexus will meet all relevant requirements under Section 214 and the FCC's standards.

Vexus is committed to meeting all of the requirements under Section 214(e) and the relevant FCC guidelines for ETC applications. Vexus' commitments are supported by its history of operations in Louisiana. Vexus, currently complies with all of the operational aspects of the FCC guidelines today in the areas that are the subject of this Petition.

1. Provision of Supported Services.

Under Section 214(e) and the FCC's guidelines, an ETC must provide the services supported by the Federal USF program throughout its designated service area, using either its own facilities or by reselling another carrier's facilities. The services designated for support are described in the FCC's rules as follows:

Voice telephony services shall be supported by federal universal support mechanisms. Eligible voice telephony services must provide voice grade access to the public switched network or its functional equivalent: minutes of use for local service provided 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 areas has implemented 911 or enhanced 911 systems, and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.¹⁷

In addition, the FCC standards require that the ETC offer all of the designated services.¹⁸ Consistent with these requirements, Vexus will offer all of the designated services. In addition to submitting its informational tariff to the Commission, Vexus will make it available on its website and in other materials available to customers. As a result, Vexus fulfills the requirement for specific services to be available through its current offerings.

2. Advertising

¹⁷ 47 C.F.R. §(a).

¹⁸ 47 C.F.R. §54.101(b).

Under Section 214(e), an ETC is required to "advertise the availability of [its] services and the charges therefore using media of general distribution."¹⁹ As a result of the FCC's Lifeline Reform Order, additional requirements have been added. These additional provisions require that materials describing the ETC's services shall use easily understood language and indicate that: 1) the service is a Lifeline service; 2) that Lifeline is a government assistance program; 3) that the service is non-transferable; 4) that only eligible consumers may enroll; and 5) that the program is limited to one discount per household.²⁰

Vexus intends to advertise its service offerings via its website, social media and direct mail. Vexus will continue to advertise its broadband and VoIP services, along with Lifeline offerings, in all appropriate media, and will comply with the additional advertising requirements now codified at 47 C.F.R. §54.405. In addition, Vexus will comply with all additional advertising requirements that may be promulgated by the FCC or the Commission in the future directed to all designated ETCs.

3. Financial and Technical Capability

Through support from NTS and its parent company, and with receipt of federal support through the Lifeline program, Vexus has the financial resources to provide Lifeline supported services in Louisiana to qualified customers. A service order form will identify the qualifications of the Lifeline program and customers will be required to provide proof of qualification as the program dictates.

As stated in the introduction to this application, Vexus currently operates as a CLEC and long distance provider in Louisiana. Vexus received a State Video Cable Franchise to operate in

¹⁹ 47 U.S.C. §214(e)(1)(B). This requirement is also codified at 47 C.F.R. §201(d)(2).

²⁰ 47 C.F.R. §54.405.

Louisiana in 2011 and shortly thereafter began providing services. By obtaining operating authority, and operating in the state of Louisiana, Vexus has demonstrated that it has the financial and technical capability to provide services.

Vexus offers multiple services in Louisiana, including voice products as well as high speed internet, high speed data connections, and cable television services. Vexus already owns fiber and network equipment needed to provide the supported services, and to expand those services. Vexus has designed its underground fiber network to contain multiple redundant connections. To ensure reliability, this system is monitored twenty-four hours per day, seven days per week, three hundred sixty-five days per year, at Network Operating Centers located in Lubbock, Texas. While Vexus' network design facilitates reliability, such as mitigation of weather-related impacts, Vexus' network operations staff is always available to assist its customers.

Vexus will offer and provide voice, broadband and cable television services to non-Lifeline customers. Vexus will serve business customers and derives revenue from providing those services independent of USF funding. Vexus has not been subject to any enforcement action or ETC revocation proceedings in Louisiana or in any other jurisdiction.

C. Vexus also meets additional requirements considered by the FCC when reviewing FCC applications.

Although FCC rules do not bind the states, in prior dockets, the Commission has evaluated compliance with additional FCC requirements for ETC designation. Vexus demonstrates that it also satisfies these additional FCC requirements²¹ demonstrated as follows:

1) Certification of Compliance with Applicable Service Requirements

²¹ 47 C.F.R §54.202.

Vexus will provide voice and high-speed Internet access consistent with the requirements of the applicable federal support programs in which it is allowed to participate.

2) Ability to Remain Functional in Emergency Situations

Vexus has designed its underground fiber network to be both reliable and resilient in both typical operating conditions and in emergencies.

3) Satisfaction of Applicable Consumer Protection and Service Quality Standards

Since it was first authorized to provide service in Louisiana, Vexus has been committed to meeting all applicable customer service requirements, and it reiterates its commitment with this application. Vexus will also continue to comply with all mandated consumer protection requirements. As a business based in the community in which it provides service, Vexus strives to treat all customers fairly and respectfully. Vexus complies with customer privacy and truth in billing requirements.

The FCC's additional rules also set forth requirements for common carriers seeking ETC designation for purposes of receiving only Lifeline support. Because Vexus is seeking designation for both high cost and low-income support, these requirements are inapplicable.

Finally, the FCC's additional rules require satisfaction of a public interest evaluation. Herein, Vexus has addressed its satisfaction of the Commission's public interest evaluation, as set forth in its ETC Order.

V. CONCLUSION

Vexus has demonstrated its qualifications for ETC designation for the purpose of utilizing federal universal service support. The public interest will be served by Vexus' investment and service offerings in unserved and underserved areas of Louisiana, bringing broadband with speeds of at least 25 Mbps to customers in rural areas in Louisiana that do not have access to this service.

Vexus respectfully requests that the Commission grant its Petition, and designate it as an ETC statewide in the rural study areas of AT&T Louisiana and AT&T Southeast, Century Link Communications. LLC, Century Link of Louisiana. LLC, and Charter Communications.

Respectfully Submitted,

**NTS COMMUNICATIONS
D/B/A VEXUS FIBER**

By: 

J. Andrew Gipson

JONES WALKER LLP

190 E Capitol St, Suite 800

Jackson, MS 39201

Tel.: (601) 949-4789

Fax: (601) 949-4804

Counsel for NTS Communications

VERIFICATION

J. Keith Davidson, Chief Financial Officer of NTS Communications, LLC d/b/a Vexus Fiber (the "Company"), and first being sworn on oath, deposes and says:

1. I have read the Petition filed by the Company with the Louisiana Public Service Commission ("Commission") and verify that the statements made therein are true and correct to the best of my knowledge, information and belief.

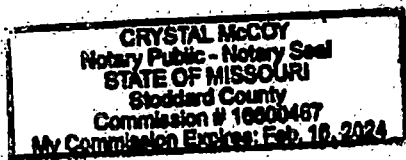
2. I hereby verify that the corporation will comply with and abide by the Commission guidelines and requirements presently in effect or otherwise adopted in the future.

3. I hereby verify that the Commission has not previously designated the Company as an ETC in the state of Louisiana.



J. Keith Davidson, Chief Financial Officer

Sworn to and subscribed before me this the 8th day of July, 2021.



Crystal McCoy
Notary Public

ATTACHMENT A

NTS Communications d/b/a Vexus Fiber Services/Service Areas/Calling Areas

1. Services

Vexus Fiber offers voice services, including local exchange and long distance services, and broadband services. .

2. Service and Calling Areas

Vexus Fiber's Service and Calling Areas (see attached)

Tar Code	Location	State	City/County	County
210532755	LA HAMMOND	LA	City	Tangipahoa
210318125	LA COVINGTON	LA	City	Saint Tammany
210501850	LA AMITE	LA	City	Tangipahoa
210561615	LA PONCHATOULA	LA	City	Tangipahoa
210537025	LA INDEPENDENCE	LA	City	Tangipahoa
209137025	LA INDEPENDENCE	LA	City	Saint Helena
	LA AMITE TANGIPAHOA			
10501850X	PARISH	LA	County	Tangipahoa
211727190	LA FRANKLINTON	LA	City	Washington
	LA HAMMOND TANGIPAHOA			
10532755X	PARISH	LA	County	Tangipahoa
	LA INDEPENDENCE -			
	TANGIPAHOA			
10537025X	PARISH	LA	County	Tangipahoa
207506120	LA BELLE CHASSE	LA	City	Plaquemines
210318125	LA COVINGTON	LA	City	Saint Tammany
210545635	LA LORANGER	LA	City	Tangipahoa
210532755	LA HAMMOND	LA	City	Tangipahoa
207155000	LA NEW ORLEANS	LA	City	Orleans
208946615	LA LULING	LA	City	Saint Charles
210326140	LA FOLSOM	LA	City	Saint Tammany
205150115	LA METAIRIE	LA	City	Jefferson
210348225	LA MANDEVILLE	LA	City	Saint Tammany
208967740	LA SAINT ROSE	LA	City	Saint Charles
207380955	LA WEST MONROE	LA	City	Ouachita
		LA		East Baton
203305000	LA BATON ROUGE		City	Rouge
207351410	LA MONROE	LA	City	Ouachita
210561615	LA PONCHATOULA	LA	City	Tangipahoa
210501850	LA AMITE	LA	City	Tangipahoa
210936255	LA HOUMA	LA	City	Terrebonne
	LA MANDEVILLE - ST	LA		
10348225X	TAMMANY PARISH		County	Saint Tammany
210370805	LA SLIDELL	LA	City	Saint Tammany

ATTACHMENT B

NTS Communications d/b/a Vexus Fiber Service Area in Rural Study Areas

Vexus Fiber's service area is located within the rural study/census block areas of AT&T, CenturyLink/Tel and Charter Communications as follows:

Tar Code	Location	State	City/County	County
210532755	LA HAMMOND	LA	City	Tangipahoa
210318125	LA COVINGTON	LA	City	Saint Tammany
210501850	LA AMITE	LA	City	Tangipahoa
210561615	LA PONCHATOULA	LA	City	Tangipahoa
210537025	LA INDEPENDENCE	LA	City	Tangipahoa
209137025	LA INDEPENDENCE	LA	City	Saint Helena
	LA AMITE TANGIPAHOA			
10501850X	PARISH	LA	County	Tangipahoa
211727190	LA FRANKLINTON	LA	City	Washington
	LA HAMMOND TANGIPAHOA			
10532755X	PARISH	LA	County	Tangipahoa
	LA INDEPENDENCE -			
	TANGIPAHOA			
10537025X	PARISH	LA	County	Tangipahoa
207506120	LA BELLE CHASSE	LA	City	Plaquemines
210318125	LA COVINGTON	LA	City	Saint Tammany
210545635	LA LORANGER	LA	City	Tangipahoa
210532755	LA HAMMOND	LA	City	Tangipahoa
207155000	LA NEW ORLEANS	LA	City	Orleans
208946615	LA LULING	LA	City	Saint Charles
210326140	LA FOLSOM	LA	City	Saint Tammany
205150115	LA METAIRIE	LA	City	Jefferson
210348225	LA MANDEVILLE	LA	City	Saint Tammany
208967740	LA SAINT ROSE	LA	City	Saint Charles
207380955	LA WEST MONROE	LA	City	Ouachita
		LA		East Baton
203305000	LA BATON ROUGE		City	Rouge
207351410	LA MONROE	LA	City	Ouachita
210561615	LA PONCHATOULA	LA	City	Tangipahoa
210501850	LA AMITE	LA	City	Tangipahoa
210936255	LA HOUMA	LA	City	Terrebonne
	LA MANDEVILLE - ST	LA		
10348225X	TAMMANY PARISH		County	Saint Tammany
210370805	LA SLIDELL	LA	City	Saint Tammany