

# ADAMS AND REESE LLP

April 23, 2024

## VIA HAND DELIVERY

Ms. Terri Lemoine Bordelon  
Records and Recording  
Louisiana Public Service Commission  
602 North Fifth Street, 12<sup>th</sup> Floor  
Baton Rouge, LA 70802

RE: Docket No. ~~8-35839~~  
Cebridge Telecom LA, LLC, ex parte.  
In Re: Application of Cebridge Telecom LA, LLC for Designation as an Eligible  
Telecommunications Carrier to Receive Rural Digital Opportunity Fund (Auction 904)  
Support for Voice and Broadband Services

Dear Ms. Bordelon:

Attached please find the original and three (3) copies of *Request of Cebridge Telecom LA, LLC to Relinquish its Eligible Telecommunications Carrier Designation* in the above-referenced docket. We ask that you file-stamp the extra copy indicating your receipt and return it to our courier.

Please call me at (225) 378-3232 if you should have any questions regarding this matter.

Thank you for your attention to this request. We remain

Sincerely yours,

ADAMS AND REESE LLP

Robert L. Rieger, Jr.

RLR/kg

cc: All Commissioners (via electronic mail)  
Brandon Frey, Esq. (via electronic mail)  
Kathryn Bowman, Esq., LPSC (via electronic mail)  
Mr. Arnold Chauviere, LPSC (via electronic mail)  
Official Service List (via electronic mail)  
Bill Atkinson, Esq. (via electronic mail)

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LA PUBLIC SERVICE COMM  
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Attorneys at Law  
Alabama  
Colorado  
Florida  
Georgia  
Louisiana  
Mississippi  
North Carolina  
South Carolina  
Tennessee  
Texas  
Washington, DC

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724-72917

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF**

**APPLICATION OF CEBRIDGE  
TELECOM LA, LLC FOR  
DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER  
TO RECEIVE RURAL DIGITAL  
OPPORTUNITY FUND (AUCTION 904)  
SUPPORT FOR VOICE AND  
BROADBAND SERVICES**

**DOCKET NO. S-35839**

LA PUBLIC SERVICE COMM  
APR 23 2024 PM1:57

**REQUEST OF CEBRIDGE TELECOM LA, LLC TO RELINQUISH ITS ELIGIBLE  
TELECOMMUNICATIONS CARRIER DESIGNATION**

In accordance with 47 U.S.C. § 214(e)(4) and Federal Communications Commission (“FCC”) Rule 54.205, Cebridge Telecom LA, LLC (“Cebridge” or the “Company”), by its attorneys, respectfully submits this request to the Louisiana Public Service Commission (“Commission”) to issue by July 30, 2024, an Order confirming the Company’s relinquishment of its eligible telecommunications carrier (“ETC”) designation (the “Request”). In support of the Request, the Company states the following:

**I. BACKGROUND**

Cebridge, an indirect subsidiary of Altice USA, Inc., is a Delaware limited partnership with its principal place of business at One Court Square, Long Island City, New York 11101. The Company is a communications services provider, offering broadband internet, video, and digital phone service to numerous communities across Louisiana. The Company is authorized by the Commission to provide local exchange telecommunications services throughout Louisiana under Certificate No. TSP00586.

On February 7, 2020, the Federal Communications Commission (“FCC”) issued a Report and Order adopting the Rural Digital Opportunity Fund (“RDOF”), in which service providers competed to receive up to \$20.4 billion to offer voice and broadband service in unserved high-cost areas.<sup>1</sup> The Company participated in Phase I of the RDOF auction (Auction 904) and was a successful winning bidder in several states, including Louisiana, as set forth in the FCC’s December 7, 2020 public notice announcing Auction 904 results (the “Auction 904 Results Notice”).<sup>2</sup> Specifically, the FCC designated the Company as a winning bidder of \$303,952 in eighteen (18) census blocks groups (“CBGs”) in Louisiana<sup>3</sup> – all of which, to the best of the Company’s knowledge, are within the geographic areas served by numerous other ETC-designated wireless and incumbent local exchange carrier (“ILEC”) providers.<sup>4</sup>

To receive RDOF support, the FCC required the Company (and other RDOF winning bidders) to secure designation as an ETC in the areas where it was identified as a winning bidder in the RDOF proceeding. On May 14, 2021, in Docket No. S-35839, the Commission designated the Company as an ETC in the CBGs where the Company was deemed a winning RDOF bidder.<sup>5</sup>

On March 15, 2024, the Company notified the FCC via a filing in the FCC’s RDOF docket of its intent to surrender its awarded RDOF support for the 18 CBGs in Louisiana where it was

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<sup>1</sup> See *In re Rural Digital Opportunity Fund, et al.*, Report and Order, 35 FCC Rcd. 686 (2020).

<sup>2</sup> See *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes*, Public Notice, 35 FCC Rcd. 13888 (2020). The designated winning bidder, Altice USA, Inc., formally assigned its winning bids to its subsidiary, the Company, on December 22, 2020, consistent with FCC procedures.

<sup>3</sup> See *Rural Digital Opportunity Fund Support Authorized for 95 Winning Bids*, Public Notice, 37 FCC Rcd. 9317, 9327-28 Attach. A (2022). The 18 CBGs where the Company was designated as an RDOF winning bidder are identified in Exhibit A.

<sup>4</sup> See *infra* Section III. See also Exhibit B (identifying the other ETCs operating in the CBGs for which the Company seeks relinquishment of its ETC designation).

<sup>5</sup> See *In re Application for Designation as an Eligible Telecommunications Carrier*, Docket No. S-35839, Order No. S-35839 (May 14, 2021).

identified as a winning bidder and designated as an ETC by the Commission.<sup>6</sup> As the Company noted in its letter, it intends to surrender its RDOF support in these CBGs to ensure the unserved areas therein will be eligible to receive federal funding to support symmetric gigabit speeds through the Broadband Equity Access and Deployment (“BEAD”) Program and other federal or state funding programs.<sup>7</sup>

On March 20, the FCC responded to the Company’s letter to confirm receipt and to acknowledge that the Company would not be fulfilling its RDOF obligations in the 18 CBGs in Louisiana where it was awarded RDOF support.<sup>8</sup> The FCC also acknowledged that, due to the Company’s surrender, it would not be entitled to RDOF support for the identified CBGs and that the unserved areas within the CBGs will be removed from the FCC’s Broadband Funding Map so that they are eligible for funding through the BEAD Program and other federal or state funding programs.<sup>9</sup>

On March 28, 2024, the Company filed with this Commission its quarterly update on its RDOF deployment efforts, confirming therein the facts referenced above and acknowledging that, while some of the Company’s existing passings in the 18 CBGs where it was awarded RDOF support now had access to higher broadband speeds as a result of network upgrades, no significant

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<sup>6</sup> *In re Rural Digital Opportunity Fund, et al.*, WC Docket No. 10-90, Letter from C. Chou, Vice President, Federal Affairs, Altice USA, Inc., to T. Harkrader, Chief, Wireline Competition Bureau, FCC (Mar. 15, 2024), attached hereto as **Exhibit C**.

<sup>7</sup> *See id.* at 1.

<sup>8</sup> *See* Letter from T. Harkrader, Chief, Wireline Competition Bureau, FCC, to C. Chou, Vice President, Federal Affairs, Altice USA, Inc. (Mar. 20, 2024), attached hereto as **Exhibit D**.

<sup>9</sup> *See id.* at 1. The FCC’s Wireline Competition Bureau thereafter issued on April 15, 2024, a public notice announcing that, *inter alia*, the 18 Louisiana CBGS identified in the Company’s March 15, 2024 letter would be eligible for other federal and state funding programs. *See Wireline Competition Bureau Announces Certain RDOF and CAF Phase II Auction Census Block Groups Are Eligible for Other Funding Programs*, Public Notice, DA 24-357 (Wireline Comp. Bur. Apr. 15, 2024).

new deployment activity related to its RDOF obligations had occurred.<sup>10</sup> Since filing its quarterly update, no further buildout activity in the 18 CBGs where the Company was awarded RDOF support has occurred.

Given that the Company will not be providing service in the 18 CBGS where it was awarded RDOF support pursuant to any RDOF obligations and that it has surrendered all awarded RDOF support for said CBGs, there is no longer a need for the Company to hold any ETC designation in Louisiana. Accordingly, the Company files this Request to relinquish its ETC designation in all CBGs in Louisiana where the Company has been designated as an ETC.

## **II. STANDARD**

Federal law provides an objective standard for ETC relinquishment: that a state commission “shall permit” an ETC to relinquish its ETC designation “in any area” so long as that area is served by more than one ETC, and the FCC’s rules require an ETC to “give advance notice to the state commission of such relinquishment.”<sup>11</sup> The FCC’s rules also provide that each state commission shall permit the ETC to relinquish said ETC designation upon written notification to its customers and a determination that: (i) federally supported services will still be provided to any effected customers by another ETC and (ii) sufficient notice of relinquishment has been provided to permit the purchase or construction of adequate facilities by any remaining ETCs in the ETC-designated area.<sup>12</sup> Importantly, though, in cases such as this, where the ETC-designated entity is not providing federally-supported services to customers in its ETC-designated service area, the Commission has determined that: (i) no customer notice requirement exists where the ETC-

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<sup>10</sup> *See In re Eligible Telecommunications Carriers’ Quarterly Updates on Deployment Efforts of Rural Digital Opportunity Funding*, Docket X-36696, Letter from R. Rieger, Outside Counsel, Cebridge, to B. Frey, Executive Secretary, Commission (Mar. 28, 2024).

<sup>11</sup> 47 C.F.R. § 54.205(a).

<sup>12</sup> *Id.* § 54.205(b).

designated entity is not providing federally-supported services and (ii) no facility purchase/construction notice requirement exists where the ETC-designated area is being served by another ETC.<sup>13</sup> As described further below, the Company meets the established standard for ETC relinquishment.

### III. REQUEST

The Company will not receive RDOF support in Louisiana and will therefore not be providing any RDOF-supported services in Louisiana. As such, the original purpose for which the Company originally sought an ETC designation from the Commission has changed, and ETC designation is no longer necessary.<sup>14</sup> Further, public records indicate that numerous other ETCs operate in each of the geographic areas of the CBGs where the Company has been designated as an ETC.<sup>15</sup> Given these providers' operation as ETCs in the geographic areas of the CBGs where the Company was designated as an ETC, Louisiana consumers in these areas will continue to have access to federally-supported services.

No consumer will be impacted by the Commission granting the Company's Request because the Company does not serve any Louisiana customers pursuant to its ETC designation.<sup>16</sup> Thus, there will be no impact on any Louisiana residents associated with the relinquishment of the Company's ETC designation.

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<sup>13</sup> See, e.g., *In re Cable One VoIP LLC's Request to Partially Relinquish Its Eligible Telecommunications Carrier Designation Approved by the Commission in Order No. S-35938, Docket No. S-36484, Order, at 3* (Nov. 10, 2022) ("*Order Granting Cable One ETC Relinquishment Application*").

<sup>14</sup> See *id.* (granting the relinquishment of a provider's ETC designation where the provider "does not currently serve any customers pursuant to its ETC designation").

<sup>15</sup> See **Exhibit B**.

<sup>16</sup> See *id.* (granting the relinquishment of a provider's ETC designation where "no consumer will be impacted by [the] Request ... [because] there are no customers serviced by this ETC designation").

#### IV. CONCLUSION

WHEREFORE, for the foregoing reasons, the Company respectfully requests that the Commission issue a decision by July 30, 2024, granting this Request and issuing an Order confirming the Company's relinquishment of its ETC designation in all geographic areas of Louisiana, as well as relief from any ongoing duties or obligations associated with the relinquished ETC designation.

Respectfully submitted this 23rd day of April, 2024.

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Davis Wright Tremaine LLP  
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Washington, D.C. 20005  
[kchalm@dwtd.com](mailto:kchalm@dwtd.com)  
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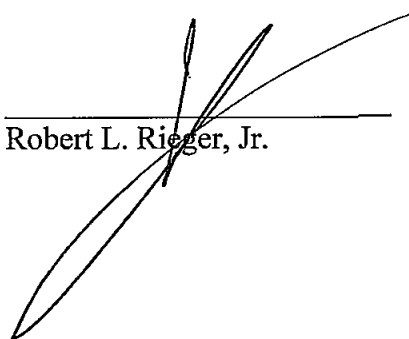
**ADAMS AND REESE LLP**

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*Counsel for Cebridge Telecom LA, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been sent via email to all LPSC Commissioners and Brandon Frey, and all parties listed on the Official Service List, this 23rd day of April, 2024.

  
Robert L. Rieger, Jr.



**EXHIBIT A**

**CENSUS BLOCK GROUPS WHERE  
CEBRIDGE TELECOM LA, LLC IS DESIGNATED  
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

220090303001  
220090304003  
220090304005  
220090304006  
220090305004  
220090305005  
220090305006  
220090307002  
220090307004  
220150110023  
220190020002  
220450304002  
220790135003  
220790135004  
220850002003  
220850003001  
220850005001  
221010410002

**EXHIBIT B**

**OVERLAPPING ETC-DESIGNATED PROVIDERS IN CENSUS BLOCK GROUPS  
WHERE CEBRIDGE TELECOM LA, LLC IS DESIGNATED AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER**

The Company's ETC-designated service territory in Louisiana is located in the geographic areas listed below. Other known ETCs operating in each of the areas are listed. This list of overlapping ETCs was determined by using the "Companies Near Me" search tool available on the Universal Service Administrative Company ("USAC") website.

<b>Parish</b>	<b>Census Block Group</b>	<b>Located Near</b>	<b>Other ETCs</b>
Avoyelles	220090303001	Marksville	Access Wireless, TerraCom Wireless, Assurance Wireless, Global Connection of America, Safelink Wireless, Q Link Wireless, CenturyLink, Life Wireless, Tag Mobile, New Phone Wireless, CenturyLink
Avoyelles	220090304003	Marksville	Access Wireless, TerraCom Wireless, Assurance Wireless, Global Connection of America, Safelink Wireless, Q Link Wireless, CenturyLink, Life Wireless, Tag Mobile, New Phone Wireless, CenturyLink
Avoyelles	220090304005	Marksville	Access Wireless, TerraCom Wireless, Assurance Wireless, Global Connection of America, Safelink Wireless, Q Link Wireless, CenturyLink, Life Wireless, Tag Mobile, New Phone Wireless, CenturyLink
Avoyelles	220090304006	Marksville	Access Wireless, TerraCom Wireless, Assurance Wireless, Global Connection of America, Safelink Wireless, Q Link Wireless, CenturyLink, Life Wireless, Tag Mobile, New Phone Wireless, CenturyLink
Avoyelles	220090305004	Mansura, Hessmer	New Phone Wireless, Assurance Wireless, CenturyLink, Q Link Wireless, Tag Mobile, Safelink Wireless, CenturyLink, Access Wireless, Life Wireless
Avoyelles	220090305005	Mansura, Hessmer	New Phone Wireless, Assurance Wireless, CenturyLink, Q Link Wireless, Tag Mobile, Safelink Wireless, CenturyLink, Access Wireless, Life Wireless
Avoyelles	220090305006	Mansura, Hessmer	New Phone Wireless, Assurance Wireless, CenturyLink, Q Link Wireless, Tag Mobile, Safelink Wireless, CenturyLink, Access Wireless, Life Wireless

Parish	Census Block Group	Located Near	Other ETCs
Avoyelles	220090307002	Moreauville, Cottonport, Evergreen, Bunkie	CenturyLink, New Phone Wireless, Assurance Wireless, Safelink Wireless, Life Wireless, Q Link Wireless, Access Wireless, CenturyLink, TerraCom Wireless, Global Connection of America, Tag Mobile
Avoyelles	220090307004	Cottonport, Evergreen, Bunkie	CenturyLink, New Phone Wireless, Assurance Wireless, Safelink Wireless, Life Wireless, Q Link Wireless, Access Wireless, CenturyLink, TerraCom Wireless, Global Connection of America, Tag Mobile
Bossier	220150110023	Bossier City, Haughton	Assurance Wireless, Safelink Wireless, Q Link Wireless, Tag Mobile, Access Wireless, Global Connection of America, New Phone Wireless, TerraCom Wireless, StandUP Wireless, Life Wireless
Calcasieu	220190020002	Iowa, Hayes	CenturyLink, Access Wireless, Safelink Wireless, New Phone Wireless, Assurance Wireless, Life Wireless, Q Link Wireless, Tag Mobile
Iberia	220450304002	Iberia	Life Wireless, Cox Communications-Acadiana, Q Link Wireless, Global Connection of America, AT&T Mobility, Tag Mobile, New Phone Wireless, Access Wireless, TerraCom Wireless, Assurance Wireless, StandUP Wireless, Safelink Wireless
Rapides	220790135003	Glenmora	CenturyLink, Life Wireless, Q Link Wireless, Access Wireless, CenturyLink, Safelink Wireless, Assurance Wireless
Rapides	220790135004	Glenmora	CenturyLink, Life Wireless, Q Link Wireless, Access Wireless, CenturyLink, Safelink Wireless, Assurance Wireless
Sabine	220850002003	Zwolle	Safelink Wireless, Life Wireless, Q Link Wireless, Tag Mobile, Global Connection of America
Sabine	220850003001	Zwolle, Noble	Safelink Wireless, Life Wireless, Q Link Wireless, Tag Mobile, Global Connection of America, New Phone Wireless, Access Wireless
Sabine	220850005001	Zwolle, Noble	Safelink Wireless, Life Wireless, Q Link Wireless, Tag Mobile, Global Connection of America, New Phone Wireless, Access Wireless

<b>Parish</b>	<b>Census Block Group</b>	<b>Located Near</b>	<b>Other ETCs</b>
St. Mary	221010410002	Franklin, Charenton	Q Link Wireless, Life Wireless, TerraCom Wireless, Assurance Wireless, Cox Communications-Acadiana, Tag Mobile, Global Connection of America, Safelink Wireless, Access Wireless, StandUP Wireless, New Phone Wireless



EXHIBIT  
C

March 15, 2024

VIA ECFS

Mr. Trent Harkrader  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
45 L Street, NE  
Washington, D.C. 20554

**Re: Rural Digital Opportunity Fund, WC Docket No. 19-126; Connect America Fund, WC Docket No. 10-90; The Rural Digital Opportunity Fund (Auction 904), AU Docket No. 20-34**

Dear Mr. Harkrader:

Altice USA, Inc., through its affiliate Cebridge Telecom LA, LLC ("Altice"), was awarded Rural Digital Opportunity Fund ("RDOF") funding to deploy 100/20 Mbps service to 18 census block groups ("CBGs") in Louisiana.<sup>1</sup> Through this letter, Altice notifies the Federal Communications Commission of its plans to surrender its awarded RDOF areas in Louisiana listed below.

Altice is committed to closing the digital divide and delivering high-speed broadband to rural communities, including through expansion of its broadband network in Louisiana, and had begun connecting unserved locations in its RDOF areas. By relinquishing these CBGs now, however, Altice is ensuring that remaining unserved areas are eligible to receive federal funding to support symmetric gigabit speeds through programs like NTIA's Broadband Equity Access and Deployment ("BEAD") Program. Indeed, Louisiana is in the process of finalizing its BEAD eligibility map and removing these CBGs as federally-funded will permit them to receive even higher speeds.

Altice understands that it will no longer be entitled to receive further RDOF support for the surrendered CBGs and that it may be subject to the applicable non-compliance rules.<sup>2</sup> Altice

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<sup>1</sup> See *Rural Digital Opportunity Fund Support Authorized for 95 Winning Bids*, Public Notice, 37 FCC Rcd 9317, 9327-28 Attach. A (2022).

<sup>2</sup> See 47 C.F.R. §§ 54.320(d), § 54.806(c); see also *Wireline Competition Bureau Announces Certain RDOF and CAF II Auction Census Block Groups are Eligible For Other Funding Programs* at 5-6, Public Notice, WC Docket Nos. 19-126 et al., DA 24-181 (rel. Feb. 28, 2024).

reserves and retains its rights to seek relief from any penalties, including waiver of the Commission's rules, as well as seek other relief as may be necessary.

**Census Block Groups**

220090303001  
220090304003  
220090304005  
220090304006  
220090305004  
220090305005  
220090305006  
220090307002  
220090307004  
220150110023  
220190020002  
220450304002  
220790135003  
220790135004  
220850002003  
220850003001  
220850005001  
221010410002

Please do not hesitate to reach out to the undersigned with any questions.

/s/ Cristina Chou

Cristina Chou  
Vice President, Federal Affairs  
ALTICE USA, INC.  
1 Court Square West  
Long Island City, NY 11101  
(929) 418-4544  
Cristina.Chou@AlticeUSA.com

cc: Suzanne Yelen, Federal Communications Commission  
Veneeth Iyengar, Executive Director, ConnectLA



**EXHIBIT  
D**

Federal Communications Commission  
Washington, D.C. 20554

March 20, 2024

Cristina Chou  
Vice President, Federal Affairs  
ALTICE USA, Inc.  
1 Court Square West  
Long Island City, NY 11101

Via Email: [Cristina.Chou@AlticeUSA.com](mailto:Cristina.Chou@AlticeUSA.com)

Dear Ms. Chou:

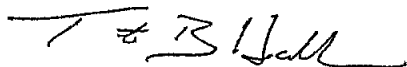
I am writing to confirm receipt of your letter stating that Cebridge Telecom LA, LLC (Altice) will not fulfill its Rural Digital Opportunity Fund (RDOF) obligations in the following Census Block Groups (CBGs) in Louisiana, and acknowledging that it is not entitled to RDOF support for these CBGs:

220090303001  
220090304003  
220090304005  
220090304006  
220090305004  
220090305005  
220090305006  
220090307002  
220090307004  
220150110023  
220190020002  
220450304002  
220790135003  
220790135004  
220850002003  
220850003001  
220850005001  
221010410002

Altice was required to serve certain census blocks within these CBGs as a condition of receiving RDOF support. Because Altice will not be meeting its obligations under RDOF, it is subject to the recovery of support and penalties under the Commission's rules.

We appreciate Altice notifying the Commission that it will not be building out broadband to these areas so that they can be removed from the Broadband Funding Map and may therefore be eligible for other federal and state broadband funding. We will share this information with our Broadband Interagency Coordination contacts at the National Telecommunications and Information Administration (NTIA), the Rural Utilities Service (RUS), and the U.S. Treasury, as well as ConnectLA.

Sincerely,

A handwritten signature in black ink, appearing to read "T B Harkrader". The signature is fluid and cursive, with the first name "Trent" and last name "Harkrader" being more legible than the middle initial "B".

Trent B. Harkrader, Chief  
Wireline Competition Bureau  
Federal Communications Commission