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ADAMS AND REESE LLP

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January 6, 2021 PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

Brandon Frey, Executive Secretary
Louisiana Public Service Commission
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Re: Docket No.: S-
Cebridge Telecom LA, LLC, ex parte
In re: Application For Designation As An Eligible Telecommunications Carrier To
Receive Rural Digital Opportunity Fund Auction (Auction 904) Support For
Voice And Broadband Services.
Request For Expedited Consideration

Dear Secretary Frey:

We represent Cebridge Telecom LA, LLC ("Cebridge") in the submission of its application to the LPSC for designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Auction (Auction 904) Support for Voice and Broadband Services. We enclose the original and two copies of Cebridge's Application and Exhibits:

1. *Application Of Cebridge Telecom LA, LLC for Designation As An Eligible Telecommunications Carrier To Receive Rural Digital Opportunity Fund Auction (Auction 904) Support For Voice And Broadband Services, With Request for Expedited Consideration;*
2. *Exhibit A – Census Block Spreadsheet and Louisiana Maps of Census Blocks (Maps of Census Blocks being filed under seal pursuant to Commission Rule 12.1);*
3. *Exhibit B – Organizational Chart;*
4. *Exhibit C – Certificate of Good Standing from the Louisiana Secretary of State;*
5. *Exhibit D – Authorization to Provide Competitive Local Exchange Services in Louisiana;*
6. *Exhibit E – RDOF Results Notice;*
7. *Exhibit F – Advertising Material;*
8. *Exhibit G – Incumbent Carriers in RDOF Census Blocks;*
9. *Exhibit H – Listing of Cebridge Management Team;*
10. *Exhibit I – Cebridge Certification. The original Certification will be filed under separate cover.*

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Brandon Frey, Executive Secretary
Louisiana Public Service Commission
January 6, 2021

Exhibit A to the Application is being filed under seal pursuant to Commission Rule 12.1. The unredacted Exhibit A is attached to this application in a fully sealed envelope appropriately marked pursuant to Commission Rule 12.1. We have also included a redacted version of Exhibit A.

Please note that Cebridge submits this Application with a request for expedited consideration.

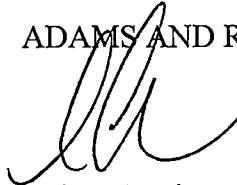
We request that this Application be published in the Commission's *Official Bulletin No. 1236* scheduled for release on January 8, 2021, with a 15-day intervention period. We have attached our firm check in the amount of \$250 to cover the required filing costs.

We have attached an additional copy of this Application and request that it be file-stamped and returned to our courier.

If you have any questions, please do not hesitate to contact us.

Sincerely yours,

ADAMS AND REESE LLP



Robert L. Rieger, Jr.
Grant J. Guillot
Susan N. Eccles
Taylor LeDuff

RLR/lba

Enclosure

LA PUBLIC SERVICE

DOCKET No.: _____

In Re: Application of Cebridge Telecom La, LLC's Application For Designation As An Eligible Telecommunications Carrier To Receive Rural Digital Opportunity Fund (Auction 904) Support For Voice And Broadband Services

CEBRIDGE TELECOM LA, LLC'S APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER TO RECEIVE RURAL DIGITAL OPPORTUNITY FUND (AUCTION 904) SUPPORT FOR VOICE AND BROADBAND SERVICES WITH REQUEST FOR EXPEDITED CONSIDERATION

NOW BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION

("Commission" or "LPSC") comes Cebridge Telecom LA, LLC ("Cebridge" or "Applicant"), who by undersigned counsel, respectfully submits this Application (the "Application") for designation as an Eligible Telecommunications Carrier ("ETC"). Cebridge's Application seeks the Commission's formal designation of Cebridge as an Eligible Telecommunications Carrier pursuant to § 214(e)(2) of the Communications Act of 1934, as amended (the "Act"), Federal Communications Commission ("FCC") rules, 47 C.F.R. Part 54.101 *et seq.*, and the Orders, Rules and Regulations of this Commission. Cebridge's designation as an ETC is critical for purposes of receiving support from the FCC's Rural Digital Opportunity Fund ("RDOF") in the locations in Louisiana for which it receives support in the FCC's recently concluded RDOF Auction 904.¹ The FCC requires that winning bidders obtain ETC

¹ See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, AU Docket No. 20-34, WC Docket No. 19-126, Public Notice, DA 20-1442 (rel. Dec. 7, 2020) (“Auction 904 Results Notice,” attached as **Exhibit E**).

designation in any areas for which they are awarded support and submit appropriate documentation of such ETC status to the FCC.

Cebridge requests ETC designation throughout the census blocks in Louisiana that it will receive RDOF support. A list of the blocks for which Altice is the winning bidder in the RDOF Auction and the maps identifying the locations is contained in **Exhibit A**. Cebridge satisfies all of the statutory and regulatory requirements for designation as an ETC in the requested designated service area. As explained herein, the public interest would be served by the Commission's approval of Cebridge's Application. Because the deadline for obtaining this designation is time sensitive, Cebridge further requests that the Commission grant expedited consideration of this Application, to result in rendering a Commission Order approving Cebridge's Application by the FCC's June 6, 2021 deadline.²

In support of this Application, Cebridge states as follows³:

I. COMMUNICATIONS AND CORRESPONDENCE

Pleadings, orders, notices, or other correspondence and communications regarding this Application should be provided to:

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² See *Auction 904 Results Notice*, at ¶ 36.

³ Cebridge will supplement or amend this Application, as appropriate.

With a copy to:

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II. BACKGROUND

A. Applicant's Overview

Cebridge Telecom LA, LLC, an indirect subsidiary of Altice USA, Inc., is a Delaware limited liability company with its principal place of business at 1 Court Square, Long Island City, New York 11011 and its domicile address located at 251 Little Falls Drive, Wilmington, Delaware 19808. Cebridge's organizational structure and relationship to its parent company are set forth in **Exhibit B**. Cebridge is authorized to do business in Louisiana pursuant to its registration with the Louisiana Secretary of State and as evidenced in the Certificate of Good Standing. *See* **Exhibit C**.

Cebridge is authorized by the Commission to provide local exchange telecommunications services in Louisiana under LPSC issued TSP00586. *See Exhibit D.*

Cebridge is a communications and media company that provides broadband internet, video and digital phone service to numerous communities across Louisiana. Cebridge strives to provide Louisiana customers with competitive, high-quality video, broadband, and voice services. Cebridge embraces technological innovation and consistently delivers advanced services to its customers and the communities it serves. Grant of this Application will ensure that Cebridge can continue to deliver on that promise by leveraging the FCC's RDOF support to build new high-capacity last mile connectivity in Louisiana, and thus, provide robust broadband and voice service to Louisiana residents. As discussed herein, Cebridge fulfills all of the statutory and regulatory requirements for ETC designation under § 214(e) of the Act. Grant of this Application will serve the public interest by enabling Cebridge to deploy broadband and voice services to unserved areas in Louisiana and invest in facilities and equipment in the state.

B. Rural Digital Opportunity Fund

On February 7, 2020, the FCC issued a Report and Order adopting the Rural Digital Opportunity Fund, in which service providers competed to receive up to \$20.4 billion to offer voice and broadband service in unserved high-cost areas. The RDOF program will disburse the funds over the course of 10 years, in two phases. In Phase I (Auction 904), the FCC awarded \$9.2 billion in funding to providers willing to deploy broadband and voice services in census blocks that lack both fixed voice and 25/3 Mbps internet access services. In Phase II, it will award the remaining \$11 billion, or more, in those census blocks that it later determines are only partially-served with the requisite voice and broadband services.

The FCC's December 7, 2020 Auction 904 Results Notice announced that Cebridge was among the winners of the recently-concluded Auction 904.⁴ *See Exhibit E.* Specifically, the FCC designated Cebridge as a winning bidder of \$303,952 for the Louisiana census blocks identified in **Exhibit A**. In order for Cebridge to receive the RDOF support that it has been awarded, it must demonstrate to the FCC that it has been designated as an ETC in the areas where it was the winning bidder. The FCC's deadline for submitting proof of the ETC designation is June 6, 2021. As a result, Cebridge respectfully requests that the Commission expeditiously grant this Application and designate it as an ETC within the time period requested herein.

III. APPLICANT MEETS ALL OF THE REQUIREMENTS FOR DESIGNATION AS AN ETC

Title 47 U.S.C. § 214(e)(2) of the Act provides that a state commission shall upon request designate a common carrier as an eligible telecommunications carrier for a service area designated by the state commission. Title 47 U.S.C. § 214(e)(1) provides that an ETC shall be eligible to receive universal service support in accordance with § 254 of the Act and shall, in the service area for which the designation is received, offer the services that are supported by federal universal service support mechanisms under § 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services, and shall advertise the availability of such services and their costs using media of general distribution.⁵ The FCC has promulgated a list of the services or functionalities that shall be supported by federal universal service support mechanisms at 47 C.F.R. § 54.101.

⁴ *See* Auction 904 Results Notice, Attachment A, at page 1. Note that the designated winning bidder, Altice USA, Inc., formally assigned its winning bids to Cebridge Telecom LA, LLC on December 22, 2020, consistent with FCC procedures.

⁵ *See Exhibit F*, Sample Copy of Advertising Materials.

The LPSC's regulations provide that ETC applications in Louisiana should be evaluated under 47 U.S.C. § 214(e) and the relevant rules and orders of the FCC.⁶ Further, the Commission has determined that requests for ETC designation should meet the requirements set forth in the Commission's *Public Interest General Order* dated May 20, 2004.⁷

Cebridge meets all of the aforementioned requirements to receive ETC designation, as demonstrated below.

A. The Applicant is a Common Carrier

Section 214(e)(1) of the Act provides that applicants for ETC designation must be common carriers.⁸ Cebridge holds a Telecommunications Service Provider (TSP) certificate, provides voice service by using its own switch, and that switch is connected to multiple call origination and call termination providers. Therefore, Cebridge satisfies the common carrier requirement of 47 U.S.C. § 214(e), for purposes of this ETC designation request.⁹

⁶ We note that for CAF recipients, the FCC has waived the requirement for a winning bidder to file a five-year plan (47 C.F.R. § 54.202(a)(1)(ii)). The FCC has adopted more specific measures to track deployment, including annual reporting of service to geocoded locations and certification of compliance with benchmark milestones. *2016 Rate-of-Return Reform Order*, 31 FCC at 3166, 3168, paras. 216, 220 (eliminating five-year plan and related progress reports for rate-of-return and price-cap carriers); *Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking*, WC Docket Nos. 10-90, 14-58, 29 FCC Rcd 8769, 8801, 8095, para. 77 (2014) (eliminating five-year plan requirement for recipients of rural broadband experiment support).

⁷ LPSC Docket No. R-27841, *In re: Establishment of public interest criteria applicable to telecommunications carriers seeking Eligible Telecommunications Carrier ("ETC") designation pursuant to 47 USC § 214(e)(2) in areas served by rural telephone companies* (released May 20, 2004).

⁸ Because the FCC has not classified voice services delivered over a voice over internet platform as telecommunications services, Petitioner reserves its right to continue offering voice and other services as services not regulated under Title II of the Communications Act or by this Commission.

⁹ Cebridge submits this Application under a reservation of rights to the extent that the Commission lacks jurisdiction over internet and/or broadband services. While those items are included in this Application to provide a holistic view of public interest designations, Applicant reserves all rights relating to the inclusion or omission of such information and references thereto. Specifically, Cebridge reserves its rights to assert objections to jurisdiction, disclosure, relevance, due process, and to appeal any such determinations outside the scope of the Commission's authority.

B. The Applicant Shall Offer Services Required by Statute

Pursuant to 47 U.S.C. § 214(e)(1)(A) and as required by 47 C.F.R. § 54.101(b), Cebridge will offer voice services supported by federal universal service support mechanisms as defined in 47 C.F.R. § 54.101(a) using its own facilities or a combination of its own facilities and resale of another carrier's services (47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)), including the following services: (1) voice grade access to the public switched network or its functional equivalent, and (2) eligible broadband Internet access services. Voice grade access to the public switched network shall include minutes of use for local service at no additional charge to end users, access to the emergency services by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems, and toll limitation services to qualifying low-income consumers as provided in subpart E of 47 C.F.R. Part 54. Eligible broadband Internet access services shall provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.

C. Applicant Is a Facilities-based Carrier and Shall Use Its Own Facilities, or a Combination of Its Own Facilities and/or Resale of Another Carrier's Services

Pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(d)(1), Cebridge shall use primarily its own facilities, but at times may purchase on a wholesale basis certain services of other carriers to offer the services that are supported by Federal universal service support mechanisms. Cebridge is a facilities-based carrier that may use a combination of its own facilities and the facilities of other service providers from time to time to provide requested

services. In Louisiana, Cebridge provides voice services as a competitive local exchange company by virtue of its Louisiana TSP certificate. *See Exhibit D.*

D. Applicant Shall Provide Service Throughout the Designated Service Area

Pursuant to 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d), Cebridge shall offer the services that are supported by Federal universal service support mechanisms throughout the service area for which designation is received. In addition, Cebridge commits to provide service throughout its proposed designated service area to all customers making a reasonable request for service. Cebridge certifies that it will provide service on a timely basis to requesting customers within Cebridge's proposed service area where Cebridge's network already passes the potential customer's premises. *See* 47 C.F.R. § 54.202(a)(1)(i). Cebridge certifies that it will provide service within a reasonable period of time and within the buildout requirements that may be established under the FCC's RDOF regulations.

E. Applicant Will Advertise Available Services

Pursuant to 47 U.S.C. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2), Cebridge shall advertise the availability of the services that are supported by Federal universal service support mechanisms and the charges for such services using media of general distribution. Cebridge may advertise, among other means, via internet, newspaper, mail circular, and radio and target residential customers with its advertising efforts. A sample copy of Cebridge's advertising materials utilized on prior marketing campaigns is attached hereto as **Exhibit F**.

F. Applicant Shall Make Available Lifeline Service

Pursuant to 47 C.F.R. § 54.405, Cebridge shall make available Lifeline service to qualifying low-income consumers and publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service. Cebridge will make a

concerted effort to notify municipal, state, and federal governmental agencies who may have access to those that will likely benefit the most from having Cebridge designated as an ETC by the Commission. In addition, Cebridge may advertise, among other means, via internet, newspaper, mail circular, and radio and target customers reasonably likely to qualify for these services with its advertising efforts.

G. Service Area for Which Designation Is Requested

Cebridge requests ETC designation in the RDOF census blocks it expects to receive RDOF support in Louisiana, which are set forth in **Exhibit A**.¹⁰

H. Emergency Situations

Pursuant to 47 C.F.R. § 54.202(a)(2), a carrier seeking ETC designation must 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.

Cebridge has a reasonable amount of back-up power to ensure functionality of voice services without a commercial power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations, subject to the duration of the commercial power outage and impact of the emergency on Cebridge's facilities. As a general matter, Cebridge considers redundancy in the design of its networks to minimize service disruptions resulting from severe weather. Cebridge's master head ends and other critical hub sites have back up power solutions, designed to address short-term commercial

¹⁰ The incumbent carriers in these RDOF census block areas are AT&T; CenturyLink of Louisiana (now known as Lumen); Kaplan Telephone Company, Inc. d/b/a Pace Communications of Vermillion; Cameron Telephone Company, LLC d/b/a Cameron Communications, LBH, LLC; Delcambre Telephone Company, LLC; Star Telephone Company, Inc. d/b/a Star Communications; and Campti-Pleasant Hill Telephone Company, Inc. *See Exhibit G*

power interruptions, and, for the field nodes, Cebridge can deploy backup power solutions such as backups or generators where it is safe to do so. Finally, Cebridge maintains a fully functional Network Operations Center (“NOC”) that monitors network operations, provisioning, maintenance and performance. Employees and technology deployed in the NOC will facilitate rapid responses to emergency situations that may arise in the future.

I. Consumer Protection, Service Quality Standards and Annual Reports

Pursuant to 47 C.F.R. § 54.202(a)(3), a carrier seeking ETC designation must demonstrate that it will satisfy applicable consumer protection and service quality standards. Cebridge commits to comply with all applicable Commission and FCC rules concerning consumer protection and service quality requirements. Further, Cebridge commits to comply with all annual reporting requirements for designated ETCs as applicable.

IV. CEBRIDGE’S FINANCIAL, MANAGERIAL AND TECHNICAL CAPABILITIES

As a RDOF qualified bidder, Cebridge provided to the FCC audited financials, and key assumptions that described with specificity proposed improvements or upgrades to Cebridge’s network over the buildout period throughout its proposed service area. In addition, Cebridge’s parent company’s financials are publicly disclosed in annual and quarterly SEC filings. The most recent SEC 10-K annual report and financial disclosure is available at: <http://d18rn0p25nwr6d.cloudfront.net/CIK-0001702780/270833fe-3f17-4cd7-b6a4-bfaa40455731.pdf>. Cebridge is financially viable and capable of providing the services described herein. Cebridge possesses the technical and managerial qualifications to provide supported services in Louisiana. Information concerning the qualifications of Cebridge’s management team is provided in **Exhibit H**.

V. DESIGNATION OF THE APPLICANT AS AN ETC IS IN THE PUBLIC INTEREST CONSISTENT WITH FEDERAL AND LOUISIANA LAW

Pursuant to 47 C.F.R. § 54.202(b), in order to grant a common carrier ETC status, a state public service commission must first determine that such designation is in the public interest. As a winning bidder in the RDOF Auction, Cebridge is positioned to receive funding to bring high-quality, innovative voice and broadband Internet access services to consumers in unserved portions of Louisiana. The RDOF funding assigned to Cebridge will help enable it to “[b]ring[] digital opportunity to Americans living on the wrong side of the digital divide,” and thereby advance the goals of universal service. Designating Cebridge as an ETC would serve the public’s interest, because Cebridge meets the requirements for designation as an ETC established under federal law and this Commission’s regulations. Competition furthers the goals of communications service and provides the consumer with a greater choice of providers and service choices, which will in turn result in market-driven prices and quality. Granting Cebridge ETC status would enhance customer choice and increase competition and is therefore in the public interest. The designation of Cebridge as an ETC will offer Louisiana customers a greater choice of providers for accessing communications services not available to such customers today. Finally, Cebridge is an FCC RDOF Auction 904 winner who will build out unserved and underserved areas under the RDOF program and ETC designation is required under that program, all of which is in the public interest.

Further, granting this Application would satisfy the criteria set forth by the LPSC in its Public Interest General Order dated May 20, 2004. In its *Public Interest Order*,¹¹ the LPSC adopted a public interest criteria which factors would be applied, on a case-by-case basis, to requests for ETC designation in rural areas.¹²

A. Grant of this Application Will Lead to Increased Competitive Choices

(Factor 1)

Louisianans rely on voice and broadband services for their communications needs. Designation of Cebridge as an ETC will increase consumer choice and provide consumers greater access to voice and broadband communications services in the rural areas designated by the RDOF census blocks. That will increase competition, advance the basic goal of preserving and advancing universal service, and provide greater competitive choices for customers in these rural areas.

B. Impact of Multiple Designations on the Universal Service Fund (Factor 2)

Granting this Application and designating Cebridge as an ETC will not increase the high-cost funding obligations of the Universal Service Fund (USF), because the support allocated to Cebridge was awarded via a reverse auction, which offers the benefits and efficiencies of managing the total amount of high-cost funding by leveraging the benefits of a competitive reverse auction process. To the extent that Cebridge obtains Lifeline subscribers, its receipt of low-income support could increase the funding obligations of the Lifeline USF. With respect to the Lifeline USF, the FCC, however, has recognized that “any increase in the size of the fund would be minimal and

¹¹ LPSC Docket No. R-27841, In re: Establishment of public interest criteria applicable to communications carriers seeking Eligible Telecommunications Carrier (“ETC”) designation pursuant to 47 USC § 214(e)(2) in areas served by rural telephone companies (released May 20, 2004).

¹² The LPSC established these thirteen¹³ factors against a background of different policies and considerations based upon impact on rural incumbent local exchange companies (“ILECS”). Certain factors do not apply to Cebridge, while others were eliminated by the Commission in subsequent orders, however, they have never been revised following implementation of federal Connect American Fund II or this current RDOF program.

would be outweighed by the benefit of increasing eligible participation in the Lifeline program, furthering the statutory goal of providing access to low income consumers.”¹³

C. Unique Advantages and Disadvantages of the Competitive Service Area Offering (Factor 3)

Granting this Application will allow Cebridge to continue to invest capital to upgrade the existing networks in rural Louisiana and provide improved service to rural Louisiana. Higher capacity, robust networks will increase connectivity and competitive options for customers in rural Louisiana. That, in turn, will expand available services and introduce competitive process on rates, terms and conditions of service between carriers offering comparable services based in rural areas of Louisiana.

D. Commitment to Quality of Service (Factor 4)

Cebridge is fully committed to enhancing service quality to its current and future customers in Louisiana. Granting this Application will allow Cebridge to increase investment in network deployment and facilities, which will expand capacity on the network and lead to better service quality for customers served by the new network facilities.

E. Submission of Records and Documentation, on a Quarterly Basis, Declaring that Carrier's Plans for Use of Universal Service Funding Received as a Result of this Commission's Designation, including Updates as to the Progress of said Projects (Factor 5)

Cebridge commits to provide an update, where appropriate, regarding low income and high cost support received from the federal USF, plans for utilization of support received for reinvestment in the rural study area, and a progress report of any special infrastructure projects undertaken in the rural study area that will be funded through the USF.¹⁴

¹³ Application of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. §214(e)(1)(A) and 47 C.P.R. § 54.201(i), CC Docket No. 96-45, Order, 20 FCC Red 15095 (2005) (*TracFone Forbearance Order*) at ¶17.

¹⁴ The LPSC has previously shown flexibility on such reporting requirements, including revising reporting deadlines and modifying the frequency of same under appropriate circumstances. . See Order No. S-35070 (February 1, 2018)

F. 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 LPSC on a Quarterly Basis (Factor 6)

This provision does not apply to wireless carriers.

G. Information Regarding the Number of Requests for Service in the Designated Area that Go Unfulfilled (Factor 7)

Cebridge will, to the best of its ability, provide service on a timely basis, and, upon reasonable request by customers in the ETC service area and agree to comply with any Commission rules.

H. Compliance with All Existing and Future State and Federal 911 and E-911 Mandates (Factor 8)

Cebridge has in the past and will in the future maintain full compliance with both federal and state requirements for providing E-911 services to its customers.

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

Cebridge submits that Section 401(B) is applicable to Commercial Radio Mobile Service Providers and Private Mobile Radio Service and is not applicable to Cebridge, which is neither.

J. Compliance with Section 302(A) of the LPSC's Regulations for Competition in the Local Telecommunications Market. (Annual Report Filings) (Factor 10)

Section 302(A) was deleted by General Order No. R-31839 dated March 11, 2014 and therefore, no response is required.

in Docket No. S-35070, *In re: Allen's T.V. Cable Service, Inc., ex parte* (In Re: Application for Designation as an Eligible Telecommunications Carrier to Receive Connect American Fund Phase II (Auction 903) Support for Voice and Broadband Services, Application filed November 14, 2018, Order rendered February 1, 2019.

K. Compliance with Sections 301A-C and 401 of the Commission's TSP Billing Order (Factor 11)

The Applicant has been, and will continue to be, compliant with Sections 301A-C and 401 of the Commission's Regulations. Cebridge will send out a printed bill at least once a month unless the customer agrees to accept billing in electronic form.

L. Compliance with any additional requirements established by the Commission in Docket R-27733, In re: Establishment of Reporting Requirements for Telecommunications Service Providers Designated as Eligible Telecommunications Carriers ("ETCs") by the Commission (Factor 12)

Cebridge is currently unaware of any additional ETC reporting requirements that have been developed by the Commission as a result of Docket R-27733. In the event that new requirements are mandated pursuant to this docket, Cebridge fully intends to comply with such requirements.¹⁵

M. A Rural Cream-Skimming Analysis (Factor 13)

Because Applicant is not seeking redefinition of any rural telephone company study area, a cream-skimming analysis is not necessary, nor required. Cebridge intends to provide voice service to new locations served in its ETC service area, as required by RDOF requirements.

VI. CERTIFICATION FOR USE OF UNIVERSAL SERVICE FUNDS

Cebridge certifies that it will comply with the service requirements applicable to the support that it receives (47 C.F.R. § 54.202(a)(1)(i)) and that it will use federal high-cost universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, in accordance with 47 U.S.C. § 254(e). Cebridge attaches to this Application, **Exhibit I** which is a verification underscoring the certifications.

¹⁵ LPSC 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.

VII. REQUEST FOR EXPEDITED TREATMENT

As stated herein, the FCC requires each Auction 904 winner to obtain ETC status in the relevant states that cover its winning bid areas and must submit required documentation of the designation no later than June 6, 2021. Cebridge submits that it has demonstrated that it meets all of the requirements to obtain ETC designation, and that approving its Application is in the public interest because it would allow Cebridge to access high cost support funds to extend its services to underserved areas in Louisiana. For these reasons, the Applicant respectfully requests that the Commission review and approve its Application on an expedited basis to allow Cebridge to meet the FCC's June 6, 2021 deadline.¹⁶ As part of expediting this Application, Cebridge respectfully requests that it be published in the Commission's *Official Bulletin No. 1236* scheduled for release January 8, 2021 with a 15-day intervention period.

VIII. CONCLUSION AND PRAYER FOR RELIEF

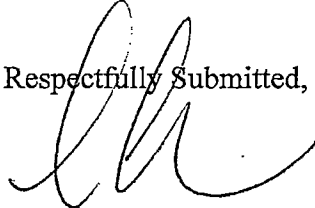
Granting Cebridge's Application will serve the public interest for the reasons identified above. Such ETC status will result in the expansion of voice and broadband service to the rural areas of Louisiana, increase the number of providers serving the RDOF Census Blocks in Louisiana, permit Cebridge to receive RDOF Auction funds designated for Louisiana, and improve economic opportunity for communities benefiting from increased connectivity.

WHEREFORE, Cebridge respectfully requests that the Louisiana Public Service Commission: (1) accept this Application for filing and publish it in the Commission's *Official Bulletin No. 1236* scheduled for release January 8, 2021 with a 15-day intervention period; (2) after due proceedings had render an Order granting this Application and designating Cebridge

¹⁶ The Commission has granted requests for expedited treatment in ETC applications under the CAFII Program. See Docket No. S-35070, *In re: Allen's T.V. Cable Service, Inc., ex parte*. (In Re: Application for Designation as an Eligible Telecommunications Carrier to Receive Connect America Fund Phase II Auction (Auction 903) Support for Voice and Broadband Services, Application filed November 14, 2018, Order rendered February 1, 2019).

as an ETC in its assigned RDOF Census Blocks; (3) issue the Order on or before June 6, 2021;
and (4) grant Cebridge such other relief as the Commission may deem appropriate.

Respectfully Submitted,



Robert L. Rieger, Jr. (Bar No. 18404)

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