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A Professional Limited Liability Company

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February 28, 2021

Via Fedex

Brandon Frey, Secretary  
Louisiana Public Service Commission  
Galvez Building, 12<sup>th</sup> Floor  
602 N. Fifth Street  
Baton Rouge, LA 70802

RE: Docket No. \_\_\_\_\_ --CableSouth Media III, LLC

Petition of CableSouth Media III, LLC for Designation as an Eligible  
Telecommunications Carrier Pursuant to Section 214(e) of the Communications  
Act of 1934 for the Purpose of Establishing Eligibility to Participate in the Rural  
Digital Opportunity Fund Phase Auction and Request for Expedited Consideration

Dear Mr. Frey,

Please find enclosed an original and three (3) copies of the Petition of CableSouth Media III, LLC for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Communications Act of 1934. An additional copy of this application has been enclosed to be date stamped and returned in the envelope provided as evidence of the filing.

Should you have any comments or questions regarding this filing, please do not hesitate to contact us.

Sincerely,



Leon Nowalsky /ul

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FD-37-13

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**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

**CABLESOUTH MEDIA III, LLC**

**DOCKET NO. 12-00000**

**IN RE:        PETITION OF CABLESOUTH MEDIA III, LLC FOR DESIGNATION  
                 AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER PURSUANT  
                 TO SECTION 214(e) OF THE COMMUNICATIONS ACT OF 1934 FOR  
                 THE PURPOSE OF ESTABLISHING ELIGIBILITY TO  
                 PARTICIPATE IN THE RURAL DIGITAL OPPORTUNITY FUND  
                 PHASE AUCTION AND REQUEST FOR EXPEDITED  
                 CONSIDERATION**

**PETITION OF CABLESOUTH MEDIA III, LLC**

**EXPEDITED TREATMENT REQUESTED**

CableSouth Media III, LLC ("CableSouth"), through undersigned counsel, hereby submits this request to the Louisiana Public Service Commission ("LPSC" or "Commission"), pursuant to Section 214(e) of the federal Communications Act of 1934, 47 U.S.C. §214(e), for designation of CableSouth as an Eligible Telecommunications Carrier (an "ETC") in its rural 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.

As demonstrated in this ETC Petition, designation of CableSouth 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. CableSouth's designation as an ETC in its rural 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.

This ETC Petition is being filed as a requirement for grantees of the Federal Communications Commission's Rural Digital Opportunity Fund Phase 1 (RDOF-) Auction awards. CableSouth's owners are members of the Segmen Egere Consortium ("Segmen Egere"). Segmen Egere was awarded funds to provide

the specified services outlined in the RDOF-1 requirements in 22 Louisiana parishes. CableSouth was designated by its owners, as described herein, to be the recipient of the grant funds to build out the network. This FCC rules are specific that the entity must be awarded ETC status no later than 180 days from the issuance of the FCC Public Notice granting the awards, which was December 7, 2020. **Therefore, CableSouth must receive authority no later than June 4, 2021.**

## **I. INTRODUCTION**

### **A. CableSouth's Background Information**

CableSouth is a provider of cable television services in rural areas within the State of Louisiana. CableSouth possesses a cable and video license that was issued by the Louisiana Secretary of State on November 17, 2008. CableSouth is a wholly owned subsidiary of Hunt Land Holding Company, LLC (“Hunt Land”). Hunt Land is a certificated competitive provider of local exchange service (“CLEC”) and long distance (“LD”) service in Louisiana, holding statewide certificate number TSP733 issued by the Louisiana Public Service Commission. Although domiciled in Tennessee, CableSouth has provided cable television services in Louisiana for approximately 15 years, and its corporate parent, Hunt Land, is a Louisiana domestic limited liability corporation. CableSouth currently employs 20 staff members within Louisiana. In addition to providing cable services, CableSouth also provides its customers in Louisiana with internet services.

CableSouth’s Louisiana service area includes areas traditionally served by incumbent local exchange carriers, AT&T Louisiana and AT&T Southwest, CenturyLink Communications, LLC and CenturyLink of Louisiana, LLC.

## **II. CABLESOUTH’S REQUEST**

CableSouth 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 CableSouth 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 it's in the public interest. Through these expanded broadband service offerings, CableSouth will also make voice service using VoIP (voice over internet protocol) available to rural customers.

### **III. THE FRAMEWORK FOR CONSIDERATION OF ETC APPLICATIONS**

ETC applications are governed by the requirements of Section 214( e) of the Communications Act, and the PCC Rules set forth in 47 C.P.R. Part 54.<sup>1</sup> / The FCC has adopted numerous guidelines for states to consider when evaluating ETC applications.<sup>2</sup>/ 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.<sup>3</sup> /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.<sup>4</sup>/

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.<sup>5</sup>/ 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 ETCs in non-rural areas if more than one

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<sup>1</sup> 47 U.S.C §214(e).

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

<sup>3</sup> 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 CableSouth is a certificated carrier in Louisiana, the LPSC has the necessary jurisdiction to consider this Petition.

<sup>4</sup> 47 U.S.C. §214(e)(1).

<sup>5</sup> 47 U.S.C. §214(e) 5).

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.<sup>6/</sup>

**A. Applicable LPSC 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 LPSC 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 LPSC clearly defined its own "public interest test" in 2004<sup>7/</sup> 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 LPSC, 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 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 LPSC and shall be immediately revoked by the LPSC, 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

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<sup>6</sup> 47 U.S.C §214(e)(2).

<sup>7</sup> LPSC 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 portion of the criteria are exclusive to wireless carriers. Further, the LPSC has noted that these criteria were intended to be used in consideration of high cost ETC applications.

of universal service funding received as a result of the LPSC'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 LPSC 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 LPSC'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 LPSC's regulations prior to implementing any such retail rates. As a condition of receiving ETC status, each wireless carrier agrees that the LPSC shall have the authority to reject any retail rate found by the LPSC 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 LPSC's Regulations for Competition in the Local Telecommunications Market (annual report filings).
11. Compliance with Section 301 (A), (B) and (C) of the LPSC's TSP Billing Order<sup>8</sup> /
12. Compliance with any additional requirements established by the LPSC in Docket No. R-27733.<sup>9</sup> /
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(c)<sup>10</sup> / 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

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<sup>8</sup> LPSC General Order dated July 14, 2000 issued in Docket No. U-24050 In re: Rules and regulations concerning Telecommunications Service Provider ("TSP") billing.

<sup>9</sup> 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.

<sup>10</sup> 47 C.F.R. §54.201.

be considered in a state ETC designation proceeding. Under the most current relevant FCC criteria <sup>11</sup> an applicant must:

1. Certify that it will comply with the service requirements applicable to the support that it receives.
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. <sup>12/</sup> This is consistent with the LPSC'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..<sup>13</sup>As discussed herein, the LPSC 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. CABLESOUTH SATISFIES LPSC AND FCC STANDARDS FOR ETC DESIGNATION**

##### **A. CableSouth's request is in the public interest as required by the LPSC.**

As noted in Section III(A), the LPSC has established its own public interest criteria to be applied when considering ETC applications in rural areas. The LPSC's "ETC Order". Order No. R-27841. sets forth thirteen

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<sup>11</sup> 47 C.F.R. §54.202.

<sup>12</sup> 47 U.S.C. §214(e)(2).

<sup>13</sup> 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.

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 LPSC's ETC Order was issued in 2004. As such, it predates the ROOF and its predecessor, the CAF. Nonetheless, the LPSC continues to apply the requirements set forth in its ETC Order. For example, in Docket No. S-35027, the LPSC 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.<sup>14</sup> Accordingly, CableSouth herein addresses the LPSC'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 CableSouth's 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 CableSouth to provide qualifying 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 CableSouth 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.

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

Granting ETC status to CableSouth will not have any significant adverse effects on the USF. CableSouth seeks funding from federal programs, and the amount designated to these programs is determined and was allocated to CableSouth in a competitive bidding process. As a result, CableSouth's participation as a recipient of federal support should not adversely impact the USF.

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

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<sup>14</sup> LPSC Docket No. S-35027, *In Re: Petition for Designation as an Eligible Telecommunications Carrier*. See Order No. S-35027 issued on August 1, 2019.



The primary advantage to CableSouth's 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, CableSouth's fiber optic networks will provide customers with access to download speeds of up to 10,000 Mbps. 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.**

CableSouth has a well-established reputation in its Louisiana service areas for providing quality service. For approximately 13 years, CableSouth has continued to invest capital to extend, upgrade and maintain its network platform, cable plant, and to train its staff. CableSouth will utilize federal support to provide voice and broadband services via underground fiber.

**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 LPSC's designation, including updates as to the progress of said projects.**

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

**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 LPSC on a quarterly basis.**

This requirement does not apply to CableSouth, as a wireline carrier. However, because CableSouth's corporate parent, Hunt Land Holdings, LLC operates as a CLEC in Louisiana, it is currently required to submit certain reports to the LPSC related to customer service matters. CableSouth and Hunt Land commit 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.**

CableSouth 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.**

Hunt Land Holdings, LLC, the corporate parent of CableSouth who a registered CLEC in Louisiana is, has been fully compliant with both federal and state requirements for providing E911 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 LPSC's Regulations for Competition in the Local Telecommunications Market. Section 401 (8) applies to providers of Commercial Radio Mobile Service (CMRS) and Private Mobile Radio Service (PMRS) and therefore is not applicable to CableSouth's Petition.**

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

**10) Compliance with Section 302(A) of the LPSC'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 LPSC's TSP Billing Order<sup>15</sup>**

CableSouth is fully compliant with Sections 301(A), (B) and (C) of the LPSC's TSP Billing Order.

**12) Compliance with any additional requirements established by the LPSC in Docket No. R-27733.<sup>16</sup>**

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<sup>15</sup> LPSC General Order dated July 14, 2000 issued in Docket No. U-24050 In re: Rules and regulations concerning Telecommunications Service Provider ("TSP") billing.

<sup>16</sup> LPSC 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.

Upon information and belief, no additional ETC reporting requirements have been developed by the LPSC as a result of Docket No. R-27733. Should the LPSC issue an order relative to any new reporting requirements for ETCs, CableSouth 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 CableSouth's instant application.

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

CableSouth is committed to meeting all of the requirements under Section 214(e) and the relevant FCC guidelines for ETC applications. CableSouth's commitments are supported by its history of operations in Louisiana. CableSouth, 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<sup>17/</sup>

The preceding definition of supported services was adopted in the FCC's Transformation

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<sup>17</sup> 47 C.F.R. §(a).

Order<sup>18</sup>:. In revising the definition, the FCC noted that the revisions were intended to shift to a technology-neutral approach. Specifically, the FCC stated:

Rather, the modified definition simply shifts to a technologically neutral approach, allowing companies to provision voice service over any platform, including the PSTN and IP networks. This modification will benefit both providers (as they may invest in new infrastructure and services) and consumers (who reap the benefits of the new technology and service offerings)<sup>19</sup>/

In addition, the FCC standards require that the ETC offer all of the designated services<sup>20</sup>/. Consistent with these requirements, CableSouth either directly or through its corporate parent, will offer all of the designated services. In addition to submitting its tariff to the LPSC, CableSouth will make it available on its website and in other materials available to customers. As a result, CableSouth fulfills the requirement for specific services to be available through its current offerings.

## **2. Advertising**

Under Section 214(e), an ETC is required to "advertise the availability of [its] services and the charges therefore using media of general distribution."<sup>21</sup> 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.<sup>22</sup>

Upon being awarded ROOF census blocks, CableSouth intends to advertise its service offerings via its website, social media and direct mail. CableSouth will continue to advertise its broadband and VoIP services, along with LifeLine offerings, in all appropriate media, and will comply with the additional advertising

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<sup>18</sup> *In re Connect America Fund*, 26 FCC Rcd, 17633, 2011 WL 5844975 (No. 18, 2011), the "Transformation Order".

<sup>19</sup> *Id.* At Paragraph 78

<sup>20</sup> 47 C.F.R. §54.101(b)

<sup>21</sup> 47 U.S.C §214(e)(1)(B). This requirement is also codified at 47 C.F.R. §201(d)(2).

<sup>22</sup> 47 C.F.R. §54.405.

requirements now codified at 47 C.F.R. §54.405. In addition, CableSouth will comply with any additional advertising requirements that may be promulgated by the FCC or the LPSC in the future directed to all designated ETCs.

### **3. Financial and Technical Capability**

Upon receipt of a federal support award, CableSouth will have 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, CableSouth through its corporate parent, Hunt Land (collectively, "CableSouth") currently operates as a CLEC, a LD provider and a CAP in Louisiana. CableSouth received a State Video Cable Franchise to operate in Louisiana in 2008 and shortly thereafter began providing services. By obtaining operating authority, and operating in the state of Louisiana, CableSouth has demonstrated that it has the financial and technical capability to provide services.

CableSouth offers multiple services in Louisiana, including voice products as well as high speed internet, high speed data connections, and cable television services. CableSouth will own fiber and network equipment needed to provide the supported services. CableSouth is designing 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 Milan, Tennessee. While CableSouth's network design facilitates reliability, such as mitigation of weather-related impacts, CableSouth's network operations staff is always available to assist its customers.

CableSouth will offer and provide local exchange service, long distance service, and cable television services to non-lifeline customers. CableSouth will serve business customers and derives revenue from providing those services independent of USF funding. CableSouth has not been subject to any enforcement action or ETC revocation proceedings in Louisiana or in any other jurisdiction.

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

Although FCC rules do not bind the states, in prior dockets, the LPSC has evaluated compliance with additional FCC requirements for ETC designation. CableSouth demonstrates that it also satisfies these additional FCC requirements<sup>23</sup>, demonstrated as follows:

**1) Certification of Compliance with Applicable Service Requirements**

CableSouth intends to 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**

CableSouth 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, CableSouth has been committed to meeting all applicable customer service requirements, and it reiterates its commitment with this application. CableSouth will also continue to comply with all mandated consumer protection requirements. As a business based in the community in which it provides service, CableSouth strives to treat all customers fairly and respectfully. CableSouth 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 CableSouth 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, CableSouth has addressed its satisfaction of the LPSC's public interest evaluation, as set forth in its ETC Order.

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
<sup>23</sup> 47 C.F.R §54.202.

## V. CONCLUSION

CableSouth has demonstrated its qualifications for ETC designation for the purpose of utilizing support from the RDOF, should it be awarded. The public interest will be served by CableSouth's 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. CableSouth respectfully requests that the LPSC grant its Petition, and designate it as an ETC in the rural study areas of AT & T Louisiana and AT & T Southeast, Century Link Communications. LLC and Century Link of Louisiana, LLC.

Respectfully submitted:



Leon Nowalsky   
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Phone (504) 832-1984  
Facsimile: (504) 832-0892  
Email: [lnowalsky@nbglaw.com](mailto:lnowalsky@nbglaw.com)

Counsel for Applicant

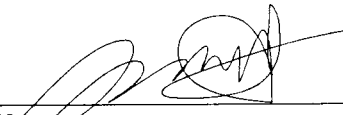
**VERIFICATION**

Jason Hunt, Manager of Hunt Land Holdings, LLC and its subsidiary, CableSouth Media III, LLC and first being sworn on oath, deposes and says:

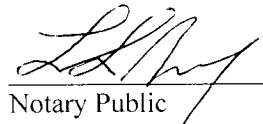
1. I have read the Application filed by the Company with the Louisiana Public Service Commission (ACommission@) and verify that the statements made therein are true and correct to the best of my knowledge, information and belief.

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 company has not previously received authority from the Commission to provide the services for which authority is sought in the Application.

  
\_\_\_\_\_  
Jason Hunt  
Hunt Land Holdings, LLC  
d/b/a Hunt Fiber  
522 Bedico Parkway  
Madisonville, LA 70447

Sworn to and subscribed before me this 26<sup>th</sup> day of February, 2021.

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

**LEON L. NOWALSKY**  
Notary Public, State of Louisiana  
My Commission is issued for life  
Notary Number : 4399



## **ATTACHMENT A**

### **CableSouth Media III, LLC**

#### **Services/Service Areas/Calling Areas**

1. Services

CableSouth offers voice services, including local exchange and long distance, and high-speed internet services.

2. Service and Calling Areas

CableSouth's Service Areas and Calling Areas

See Attached

	A	B	C	D	E
2	CBG ID	STATE	COUNTY	ITEM	
3	220039501001	LA	Allen	LA-003-9501001	
4	220039501002	LA	Allen	LA-003-9501002	
5	220039501003	LA	Allen	LA-003-9501003	
6	220039502003	LA	Allen	LA-003-9502003	
7	220039504002	LA	Allen	LA-003-9504002	
8	220039504004	LA	Allen	LA-003-9504004	
9	220039505004	LA	Allen	LA-003-9505004	
10	220090301001	LA	Avoyelles	LA-009-0301001	
11	220090301002	LA	Avoyelles	LA-009-0301002	
12	220090303002	LA	Avoyelles	LA-009-0303002	
13	220090306001	LA	Avoyelles	LA-009-0306001	
14	220090306004	LA	Avoyelles	LA-009-0306004	
15	220090307001	LA	Avoyelles	LA-009-0307001	
16	220090307005	LA	Avoyelles	LA-009-0307005	
17	220090308002	LA	Avoyelles	LA-009-0308002	
18	220119601001	LA	Beauregard	LA-011-9601001	
19	220119601002	LA	Beauregard	LA-011-9601002	
20	220119601003	LA	Beauregard	LA-011-9601003	
21	220119602001	LA	Beauregard	LA-011-9602001	
22	220119602002	LA	Beauregard	LA-011-9602002	
23	220119605001	LA	Beauregard	LA-011-9605001	
24	220119606001	LA	Beauregard	LA-011-9606001	
25	220119606002	LA	Beauregard	LA-011-9606002	
26	220119606003	LA	Beauregard	LA-011-9606003	
27	220119607001	LA	Beauregard	LA-011-9607001	
28	220119607002	LA	Beauregard	LA-011-9607002	
29	220119607003	LA	Beauregard	LA-011-9607003	
30	220139705004	LA	Bienville	LA-013-9705004	
31	220250003001	LA	Catahoula	LA-025-0003001	
32	220290002002	LA	Concordia	LA-029-0002002	
33	220290002005	LA	Concordia	LA-029-0002005	
34	220290003001	LA	Concordia	LA-029-0003001	
35	220290003002	LA	Concordia	LA-029-0003002	
36	220290004001	LA	Concordia	LA-029-0004001	
37	220319501001	LA	De Soto	LA-031-9501001	
38	220319502001	LA	De Soto	LA-031-9502001	
39	220319502005	LA	De Soto	LA-031-9502005	
40	220319503001	LA	De Soto	LA-031-9503001	
41	220319503002	LA	De Soto	LA-031-9503002	
42	220319505001	LA	De Soto	LA-031-9505001	
43	220319507002	LA	De Soto	LA-031-9507002	
44	220319507003	LA	De Soto	LA-031-9507003	
45	220379513001	LA	East Feliciana	LA-037-9513001	
46	220379513002	LA	East Feliciana	LA-037-9513002	
47	220379513003	LA	East Feliciana	LA-037-9513003	

	A	B	C	D	E
48	220379514001	LA	East Felicia	LA-037-9514001	
49	220379516001	LA	East Felicia	LA-037-9516001	
50	220379516002	LA	East Felicia	LA-037-9516002	
51	220399502001	LA	Evangeline	LA-039-9502001	
52	220399502002	LA	Evangeline	LA-039-9502002	
53	220430201002	LA	Grant	LA-043-0201002	
54	220430201003	LA	Grant	LA-043-0201003	
55	220430202001	LA	Grant	LA-043-0202001	
56	220430202002	LA	Grant	LA-043-0202002	
57	220430202003	LA	Grant	LA-043-0202003	
58	220430204011	LA	Grant	LA-043-0204011	
59	220430204012	LA	Grant	LA-043-0204012	
60	220430204013	LA	Grant	LA-043-0204013	
61	220430204014	LA	Grant	LA-043-0204014	
62	220530002001	LA	Jefferson D	LA-053-0002001	
63	220599701001	LA	LaSalle	LA-059-9701001	
64	220599701002	LA	LaSalle	LA-059-9701002	
65	220599702003	LA	LaSalle	LA-059-9702003	
66	220599702005	LA	LaSalle	LA-059-9702005	
67	220599703003	LA	LaSalle	LA-059-9703003	
68	220690001001	LA	Natchitoch	LA-069-0001001	
69	220690001002	LA	Natchitoch	LA-069-0001002	
70	220690003001	LA	Natchitoch	LA-069-0003001	
71	220690003002	LA	Natchitoch	LA-069-0003002	
72	220690003004	LA	Natchitoch	LA-069-0003004	
73	220690008001	LA	Natchitoch	LA-069-0008001	
74	220690008002	LA	Natchitoch	LA-069-0008002	
75	220690008004	LA	Natchitoch	LA-069-0008004	
76	220690008005	LA	Natchitoch	LA-069-0008005	
77	220690009001	LA	Natchitoch	LA-069-0009001	
78	220690009002	LA	Natchitoch	LA-069-0009002	
79	220790106001	LA	Rapides	LA-079-0106001	
80	220790106002	LA	Rapides	LA-079-0106002	
81	220790107003	LA	Rapides	LA-079-0107003	
82	220790133005	LA	Rapides	LA-079-0133005	
83	220790134001	LA	Rapides	LA-079-0134001	
84	220790135002	LA	Rapides	LA-079-0135002	
85	220790136002	LA	Rapides	LA-079-0136002	
86	220790136003	LA	Rapides	LA-079-0136003	
87	220819601001	LA	Red River	LA-081-9601001	
88	220819601002	LA	Red River	LA-081-9601002	
89	220819601003	LA	Red River	LA-081-9601003	
90	220819601004	LA	Red River	LA-081-9601004	
91	220819601005	LA	Red River	LA-081-9601005	
92	220850001001	LA	Sabine	LA-085-0001001	
93	220850001002	LA	Sabine	LA-085-0001002	

	A	B	C	D	E
94	220850002001	LA	Sabine	LA-085-0002001	
95	220850002002	LA	Sabine	LA-085-0002002	
96	220850004001	LA	Sabine	LA-085-0004001	
97	220850004002	LA	Sabine	LA-085-0004002	
98	220850004003	LA	Sabine	LA-085-0004003	
99	220850005002	LA	Sabine	LA-085-0005002	
100	220850005003	LA	Sabine	LA-085-0005003	
101	220850005004	LA	Sabine	LA-085-0005004	
102	220850006001	LA	Sabine	LA-085-0006001	
103	220850006002	LA	Sabine	LA-085-0006002	
104	220850006004	LA	Sabine	LA-085-0006004	
105	220850007002	LA	Sabine	LA-085-0007002	
106	220850007003	LA	Sabine	LA-085-0007003	
107	220919511001	LA	St. Helena	LA-091-9511001	
108	220919511002	LA	St. Helena	LA-091-9511002	
109	220979601003	LA	St. Landry	LA-097-9601003	
110	220979603004	LA	St. Landry	LA-097-9603004	
111	221070003002	LA	Tensas	LA-107-0003002	
112	221159501001	LA	Vernon	LA-115-9501001	
113	221159501002	LA	Vernon	LA-115-9501002	
114	221159501005	LA	Vernon	LA-115-9501005	
115	221159501006	LA	Vernon	LA-115-9501006	
116	221159502001	LA	Vernon	LA-115-9502001	
117	221159502004	LA	Vernon	LA-115-9502004	
118	221159503001	LA	Vernon	LA-115-9503001	
119	221159503002	LA	Vernon	LA-115-9503002	
120	221159503003	LA	Vernon	LA-115-9503003	
121	221159508004	LA	Vernon	LA-115-9508004	
122	221159508005	LA	Vernon	LA-115-9508005	
123	221159509003	LA	Vernon	LA-115-9509003	
124	221159509004	LA	Vernon	LA-115-9509004	
125	221259517011	LA	West Felic	LA-125-9517011	
126	221259517012	LA	West Felic	LA-125-9517012	
127	221259517021	LA	West Felic	LA-125-9517021	
128	221259518001	LA	West Felic	LA-125-9518001	
129	221259518004	LA	West Felic	LA-125-9518004	
130	221279601001	LA	Winn	LA-127-9601001	
131	221279601002	LA	Winn	LA-127-9601002	
132	221279601003	LA	Winn	LA-127-9601003	
133	221279601004	LA	Winn	LA-127-9601004	
134	221279602001	LA	Winn	LA-127-9602001	
135	221279602002	LA	Winn	LA-127-9602002	
136	221279602003	LA	Winn	LA-127-9602003	
137	221279602004	LA	Winn	LA-127-9602004	
138	221279602005	LA	Winn	LA-127-9602005	
139	221279604003	LA	Winn	LA-127-9604003	

	A	B	C	D	E
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## **ATTACHMENT B**

### **CableSouth Media III, LLC's Service Area in Rural Study Areas**

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

See attached

	A	B	C	D	E
2	CBG ID	STATE	COUNTY	ITEM	
3	220039501001	LA	Allen	LA-003-9501001	
4	220039501002	LA	Allen	LA-003-9501002	
5	220039501003	LA	Allen	LA-003-9501003	
6	220039502003	LA	Allen	LA-003-9502003	
7	220039504002	LA	Allen	LA-003-9504002	
8	220039504004	LA	Allen	LA-003-9504004	
9	220039505004	LA	Allen	LA-003-9505004	
10	220090301001	LA	Avoyelles	LA-009-0301001	
11	220090301002	LA	Avoyelles	LA-009-0301002	
12	220090303002	LA	Avoyelles	LA-009-0303002	
13	220090306001	LA	Avoyelles	LA-009-0306001	
14	220090306004	LA	Avoyelles	LA-009-0306004	
15	220090307001	LA	Avoyelles	LA-009-0307001	
16	220090307005	LA	Avoyelles	LA-009-0307005	
17	220090308002	LA	Avoyelles	LA-009-0308002	
18	220119601001	LA	Beauregard	LA-011-9601001	
19	220119601002	LA	Beauregard	LA-011-9601002	
20	220119601003	LA	Beauregard	LA-011-9601003	
21	220119602001	LA	Beauregard	LA-011-9602001	
22	220119602002	LA	Beauregard	LA-011-9602002	
23	220119605001	LA	Beauregard	LA-011-9605001	
24	220119606001	LA	Beauregard	LA-011-9606001	
25	220119606002	LA	Beauregard	LA-011-9606002	
26	220119606003	LA	Beauregard	LA-011-9606003	
27	220119607001	LA	Beauregard	LA-011-9607001	
28	220119607002	LA	Beauregard	LA-011-9607002	
29	220119607003	LA	Beauregard	LA-011-9607003	
30	220139705004	LA	Bienville	LA-013-9705004	
31	220250003001	LA	Catahoula	LA-025-0003001	
32	220290002002	LA	Concordia	LA-029-0002002	
33	220290002005	LA	Concordia	LA-029-0002005	
34	220290003001	LA	Concordia	LA-029-0003001	
35	220290003002	LA	Concordia	LA-029-0003002	
36	220290004001	LA	Concordia	LA-029-0004001	
37	220319501001	LA	De Soto	LA-031-9501001	
38	220319502001	LA	De Soto	LA-031-9502001	
39	220319502005	LA	De Soto	LA-031-9502005	
40	220319503001	LA	De Soto	LA-031-9503001	
41	220319503002	LA	De Soto	LA-031-9503002	
42	220319505001	LA	De Soto	LA-031-9505001	
43	220319507002	LA	De Soto	LA-031-9507002	
44	220319507003	LA	De Soto	LA-031-9507003	
45	220379513001	LA	East Feliciana	LA-037-9513001	
46	220379513002	LA	East Feliciana	LA-037-9513002	
47	220379513003	LA	East Feliciana	LA-037-9513003	

	A	B	C	D	E
48	220379514001	LA	East Felicia	LA-037-9514001	
49	220379516001	LA	East Felicia	LA-037-9516001	
50	220379516002	LA	East Felicia	LA-037-9516002	
51	220399502001	LA	Evangeline	LA-039-9502001	
52	220399502002	LA	Evangeline	LA-039-9502002	
53	220430201002	LA	Grant	LA-043-0201002	
54	220430201003	LA	Grant	LA-043-0201003	
55	220430202001	LA	Grant	LA-043-0202001	
56	220430202002	LA	Grant	LA-043-0202002	
57	220430202003	LA	Grant	LA-043-0202003	
58	220430204011	LA	Grant	LA-043-0204011	
59	220430204012	LA	Grant	LA-043-0204012	
60	220430204013	LA	Grant	LA-043-0204013	
61	220430204014	LA	Grant	LA-043-0204014	
62	220530002001	LA	Jefferson D	LA-053-0002001	
63	220599701001	LA	LaSalle	LA-059-9701001	
64	220599701002	LA	LaSalle	LA-059-9701002	
65	220599702003	LA	LaSalle	LA-059-9702003	
66	220599702005	LA	LaSalle	LA-059-9702005	
67	220599703003	LA	LaSalle	LA-059-9703003	
68	220690001001	LA	Natchitoch	LA-069-0001001	
69	220690001002	LA	Natchitoch	LA-069-0001002	
70	220690003001	LA	Natchitoch	LA-069-0003001	
71	220690003002	LA	Natchitoch	LA-069-0003002	
72	220690003004	LA	Natchitoch	LA-069-0003004	
73	220690008001	LA	Natchitoch	LA-069-0008001	
74	220690008002	LA	Natchitoch	LA-069-0008002	
75	220690008004	LA	Natchitoch	LA-069-0008004	
76	220690008005	LA	Natchitoch	LA-069-0008005	
77	220690009001	LA	Natchitoch	LA-069-0009001	
78	220690009002	LA	Natchitoch	LA-069-0009002	
79	220790106001	LA	Rapides	LA-079-0106001	
80	220790106002	LA	Rapides	LA-079-0106002	
81	220790107003	LA	Rapides	LA-079-0107003	
82	220790133005	LA	Rapides	LA-079-0133005	
83	220790134001	LA	Rapides	LA-079-0134001	
84	220790135002	LA	Rapides	LA-079-0135002	
85	220790136002	LA	Rapides	LA-079-0136002	
86	220790136003	LA	Rapides	LA-079-0136003	
87	220819601001	LA	Red River	LA-081-9601001	
88	220819601002	LA	Red River	LA-081-9601002	
89	220819601003	LA	Red River	LA-081-9601003	
90	220819601004	LA	Red River	LA-081-9601004	
91	220819601005	LA	Red River	LA-081-9601005	
92	220850001001	LA	Sabine	LA-085-0001001	
93	220850001002	LA	Sabine	LA-085-0001002	



	A	B	C	D	E
94	220850002001	LA	Sabine	LA-085-0002001	
95	220850002002	LA	Sabine	LA-085-0002002	
96	220850004001	LA	Sabine	LA-085-0004001	
97	220850004002	LA	Sabine	LA-085-0004002	
98	220850004003	LA	Sabine	LA-085-0004003	
99	220850005002	LA	Sabine	LA-085-0005002	
100	220850005003	LA	Sabine	LA-085-0005003	
101	220850005004	LA	Sabine	LA-085-0005004	
102	220850006001	LA	Sabine	LA-085-0006001	
103	220850006002	LA	Sabine	LA-085-0006002	
104	220850006004	LA	Sabine	LA-085-0006004	
105	220850007002	LA	Sabine	LA-085-0007002	
106	220850007003	LA	Sabine	LA-085-0007003	
107	220919511001	LA	St. Helena	LA-091-9511001	
108	220919511002	LA	St. Helena	LA-091-9511002	
109	220979601003	LA	St. Landry	LA-097-9601003	
110	220979603004	LA	St. Landry	LA-097-9603004	
111	221070003002	LA	Tensas	LA-107-0003002	
112	221159501001	LA	Vernon	LA-115-9501001	
113	221159501002	LA	Vernon	LA-115-9501002	
114	221159501005	LA	Vernon	LA-115-9501005	
115	221159501006	LA	Vernon	LA-115-9501006	
116	221159502001	LA	Vernon	LA-115-9502001	
117	221159502004	LA	Vernon	LA-115-9502004	
118	221159503001	LA	Vernon	LA-115-9503001	
119	221159503002	LA	Vernon	LA-115-9503002	
120	221159503003	LA	Vernon	LA-115-9503003	
121	221159508004	LA	Vernon	LA-115-9508004	
122	221159508005	LA	Vernon	LA-115-9508005	
123	221159509003	LA	Vernon	LA-115-9509003	
124	221159509004	LA	Vernon	LA-115-9509004	
125	221259517011	LA	West Felici	LA-125-9517011	
126	221259517012	LA	West Felici	LA-125-9517012	
127	221259517021	LA	West Felici	LA-125-9517021	
128	221259518001	LA	West Felici	LA-125-9518001	
129	221259518004	LA	West Felici	LA-125-9518004	
130	221279601001	LA	Winn	LA-127-9601001	
131	221279601002	LA	Winn	LA-127-9601002	
132	221279601003	LA	Winn	LA-127-9601003	
133	221279601004	LA	Winn	LA-127-9601004	
134	221279602001	LA	Winn	LA-127-9602001	
135	221279602002	LA	Winn	LA-127-9602002	
136	221279602003	LA	Winn	LA-127-9602003	
137	221279602004	LA	Winn	LA-127-9602004	
138	221279602005	LA	Winn	LA-127-9602005	
139	221279604003	LA	Winn	LA-127-9604003	

	A	B	C	D	E
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