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January 5, 2021

VIA HAND DELIVERY

Brandon Frey, Executive Secretary
Louisiana Public Service Commission
Galvez Building – 12th Floor
602 North Fifth Street
Baton Rouge, Louisiana 70802

RECEIVED

JAN 05 2021

Robert L. Rieger, Jr.
Direct: 225.378.3232
E-Fax: 225.336.5132
robert.rieger@arlaw.com

Re: Docket No.: S-_____ LA Public Service Commission
Gonthier Inc., d/b/a REACH4 Communications, et 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 Gonthier Inc., d/b/a REACH4 Communications ("REACH4"), 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 the following Application and Exhibits:

1. *Gonthier Inc., d/b/a REACH4 Communications' Application 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 – RDOF Results Notice;*
3. *Exhibit B – Census Blocks Spreadsheet Where REACH4 was assigned RDOF Auction Support;*
4. *Exhibit C – REACH4 Communications' Management Team;*
5. *Exhibit D – Certificate of Good Standing;*
6. *Exhibit E – LPSC Certificate of Authority;*
7. *Exhibit F – REACH4 Advertising Materials;*
8. *Exhibit G – Incumbent Carriers in RDOF Census Blocks;*
9. *Exhibit H – REACH4's Certification. This filing contains a copy of the executed Certification. The original will be filed under separate cover.*

ROUTE TO: Bul DATE 1/6 ROUTE FROM: _____
DEPT. _____ DATE _____ DEPT. _____
DEPT. _____ DATE _____ DEPT. _____
DEPT. _____ DATE _____ DEPT. _____
DEPT. _____ DATE _____ DEPT. _____

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Page 2
Brandon Frey, Executive Secretary
Louisiana Public Service Commission
January 5, 2021

Please also note that REACH4 submits this Application with a request for expedited consideration.

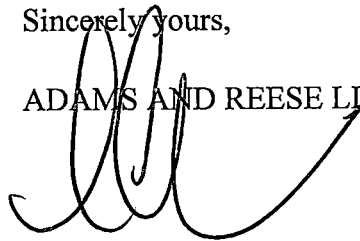
We request that this Application be published in the Commission's *Official Bulletin No. 1236* scheduled for release on January 8, 2021, with a 15-day intervention period. We have attached our firm check in the amount of \$250 to cover the required filing costs.

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

A handwritten signature in black ink, appearing to be 'RLR', written over the firm name.

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

RLR/lba

Enclosure

LOUISIANA PUBLIC SERVICE COMMISSION

CASH RECEIPTS CLASSIFICATION

CURRENT YEAR _____ PRIOR YEAR _____ DOCUMENT # _____

REVENUE SOURCE	CODE	AMOUNT
TRANSPORTATION (148 - 0063)		
Pipeline Reg/Tariff Filing	1525	\$
Stamp/Driver Fees	1615	\$
Common Carrier Certificate	1625	\$
Contract Carrier Certificate	1630	\$
Lease Filing	1635	\$
Rate Application - Inc / Dec	1645	\$
Reinstatement Fee	1650	\$
Name Change Fee	1665	\$
Rehearing Application Fee	1675	\$
Stock Transfer Fee	1680	\$
Fines & Citation Fee	1700	\$
Late Filing Ann Report	1705	\$
Fines Illegal Operations-Transportation	1710	\$
UTILITIES: (148 - 0030)		
Fees - Rate Application	1670	\$ 250 ⁰⁰ CR # 060488
Rehearing Application Fee	1675	\$
Fines/Citation - Docket # _____	1700	\$
Late Filing Fee - Annual Report	1705	\$
MISCELLANEOUS: (148 - 0030)		
Credit Card Transaction Fees	1546	\$
Fax Filing Fee	1690	\$
Certification Fee	1785	\$
General Copying-(Cert/Permit-Utilities)	1785	\$
General Copying - C D	1785	\$
General Copying - Transcripts	1785	\$
OTHER: _____		\$

COMMENT: Chad Adams & Reex Re: Application for Designation
As an Eligible Telecommunications Carrier - Gonthierberg

Prepared By: Officer DATE 1/5/2021 dba - Reach 4 Communities

RECEIVED

BEFORE THE
LOUISIANA PUBLIC SERVICE COMMISSION

JAN 05 2021

GONTHIER INC. D/B/A REACH4 COMMUNICATIONS, *EX PARTE* Public Service Commission

DOCKET No.: _____

In Re: Gonthier Inc. D/B/A REACH4 Communications' Application for Designation as an Eligible Telecommunications Carrier to Receive Rural Opportunity Fund Auction (Auction 904) Support for Voice and Broadband Services

**GONTHIER INC. D/B/A REACH4 COMMUNICATIONS' APPLICATION
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**

NOW BEFORE THE LOUISIANA PUBLIC SERVICE COMMISSION

("Commission" or "LPSC") comes Gonthier Inc. D/B/A REACH4 Communications ("REACH4 or Applicant"), who hereby submits this application (the "Application") for designation as an Eligible Telecommunications Carrier ("ETC") pursuant to § 214(e)(2) of the Communications Act of 1934 as amended (the "Act"), §§ 54.201 and 54.202 of the rules and regulations of the Federal Communications Commission ("FCC"), and the Orders, Rules, and Regulations of this Commission. REACH4 was selected as a winning bidder in the FCC's recently concluded Rural Digital Opportunity Fund ("RDOF") Phase I Auction (Auction 904). REACH4's designation as an ETC is critical for purposes of receiving support from the FCC's RDOF in the Louisiana locations for which it was awarded support.¹ The FCC requires that winning bidders obtain ETC designation in those RDOF Census Blocks as a pre-condition to receiving funding.² Accordingly,

¹ See Rural Digital Opportunity Funds Phase I Auction (Auction 904) Closes: Winning Bidders Announced: FCC Form 683 Due January 29, 2021, Public Notice, DA 20-1442 (rel. Dec. 7, 2020); RDOF Results Notice, attached hereto as **Exhibit A**.

² See Auction Results Notice. REACH4 was a member of the NexTier Consortium and per the RDOF protocols is allowed to obtain ETC authorization in its name. REACH4 was assigned those rural Census Blocks located in Acadia Parish.

REACH4 seeks the Commission's ETC recognition/designation in the RDOF census blocks in Louisiana for which it was awarded funding in the RDOF 904 Auction. A list of those census blocks identifying the Louisiana locations is contained in **Exhibit B**.

This Commission is authorized to designate entities satisfying § 214(e)(2) of the Act, if an applicant fulfills the ETC requirements of § 214(e)(1). REACH 4 meets the ETC requirements of Section 214(e)(1) of the Act. REACH4 satisfies all of the statutory and regulatory requirements for ETC designation in the requested designated service areas. As detailed in this Application, the public interest will be served by the Commission approving REACH4's Application.

Since the FCC's deadline for obtaining this designation is June 6, 2021, REACH4 hereby requests that the Commission grant expedited consideration of this Application and render an order approving of REACH4's ETC designation in advance of the June 6th deadline.³

In support of this Application, REACH4 submits the following:

I. COMMUNICATIONS AND CORRESPONDENCE

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

Robert L. Rieger, Jr.
Grant J. Guillot
Susan N. Eccles
Taylor M. LeDuff
Adams and Reese, LLP
450 Laurel Street, Suite 1900
Baton Rouge, Louisiana 70801
Phone: (225) 336-5200
Facsimile: (225)336-5220
E-mail: Robert.Rieger@arlaw.com
Grant.Guillot@arlaw.com
Susan.Eccles@arlaw.com
Taylor.LeDuff@arlaw.com

³ See Auction 904 Results Notice, at ¶ 36.

With a copy to:

Karen McBride, Vice President/General Manager
Karl Jay Domingue, Business Development/Operations Manager
Gonthier, Inc. D/B/A REACH4 Communications
927 N. Parkerson Avenue
Crowley, Louisiana 70526
Phone: (337) 783-3436
E-mail: karen.mcbride@reach4com.com
jay.domingue@reach4com.com

II. BACKGROUND

A. Applicant's Overview

REACH4 is a local family-owned business, located at 927 N. Parkerson Avenue, Crowley, LA, 70526, that has been in operation for over 60 years.⁴ A copy of REACH4's Certificate of Good Standing issued by the Louisiana Secretary of State is attached hereto as **Exhibit D** to this Application. REACH4 provides facility and wireless based telecommunication services to government agencies, private businesses, and residents in Southwest, Louisiana.

REACH4 initially began as a two-way radio shop selling and maintaining customer owned radios and repeater systems. In the early 1980's, REACH4 began offering a commercial two-way radio service. REACH4 was one of the first businesses in Louisiana to building out a Land Mobile Radio (LMR) trunked two-way radio and mobile telephone system to service the I-10 corridor between Lafayette and Lakes Charles, Louisiana. The LMR trunking system is still in operation today.

In the early 1990's, REACH4 branched out into the digital paging service by joining with other individual carriers to build out a nationwide paging network that is still operational. In 2004, REACH4 began offering fixed wireless broadband internet service. What began with one site to

⁴ See Exhibit C.

serve one customer has grown into a network of 25 tower sites, covering an area over 3,000 square miles, and servicing more than 2,200 customers.

In 2016, REACH4 began construction on the first FTTH (Fiber to the Home) project in Acadia Parish located in Estherwood, Louisiana. With over 33 miles of buried fiber optic cable, REACH4 now provides FTTH broadband services to the communities of Estherwood, Midland, Mementau, and Mire, Louisiana reaching over 1,000 rural and underserved residents in Acadia Parish.

REACH4 is a multi-homed provider as it purchases direct internet access via fiber from two different carriers for redundancy and fail-over. REACH4 also possesses its own IP addresses from ARIN for providing internet access to its customers. REACH4 operates and maintains several RADIUS servers for managing customers, web servers for hosting websites, and other mission critical servers for providing reliable fixed wireless broadband and FTTH internet service at the levels required by the RDOF protocols⁵.

REACH4 is authorized by this Commission to provide local exchange carrier and interexchange carrier telecommunications services in Louisiana under TSP00703. *See Exhibit E.*

B. Rural Digital Opportunity Fund Overview

On February 7, 2020, the FCC issued a Report and Order adopting RDOF, in which service providers would compete to receive up to \$20.4 billion to offer voice and broadband service in unserved high-cost areas.⁶ Through the RDOF program, the FCC will disburse the funds over 10 years, in two phases. Specifically, the FCC awarded \$9.2 billion to providers who will deploy broadband and voice services in census blocks that lack both fixed voice and 25/3 MBPS internet

⁵ See fn. 6 *infra*

⁶ RDOF Report and Order, 35 FCC rcd 686 (2020).

access service. In the second phase, it will award \$11 billion, or more, in those census blocks that it later determines are only partially-served with the requisite voice and broadband services.

C. REACH4's Selection as a Winning Bidder

The FCC's December 7, 2020 Auction 904 Results Notice announced that REACH4⁷ was among the winners of the Auction 904. *See Exhibit A.* Specifically, the FCC designated REACH4 as a winning bidder of the Louisiana census blocks identified in **Exhibit A** all of which are located in Acadia Parish. In order for REACH4 to receive the RDOF Auction support that it has been awarded, REACH4 must provide the FCC with confirmation that it has been designated an ETC in the RDOF census blocks in which REACH4 was the winning bidder. The FCC's deadline for submission of ETC documentation/confirmation is June 6, 2021. Accordingly, REACH4 respectfully requests that the Commission grant this Application and issue an Order designating REACH4 as an ETC no later than June 6, 2021.

III. REACH4 SATISFIES ALL STATUTORY AND REGULATORY REQUIREMENTS FOR LOUISIANA ETC DESIGNATION

Title 47 U.S.C. § 214(e)(2) mandates that a state commission shall designate a common carrier as an eligible ETC for a service area designated by a state commission. Additionally, Title 47 U.S.C. § 214(e)(1) provides that an ETC shall be eligible to receive universal support in accordance with § 254 of the Act and shall, in its designated service area, provide the services that are supported by the federal universal service support mechanisms under § 254(c) by either utilizing its own facilities or through a combination of its own facilities and the resale of another carrier's services. The FCC promulgated a list of the services and/or functionalities that shall be supported by federal universal service support mechanisms.⁸ The ETC is also required to advertise

⁷ As previously noted, REACH4 participated as part of the NexTier Consortium. *See* fn. 2, *supra*.

⁸ *See* 47 C.F.R. § 54.101.

the availability of such services and the costs using media of general distribution. REACH4 intends to conduct this advertising in a similar manner to its prior advertising practices. See **Exhibit F**, REACH4 advertising materials. REACH4 intends to provide such services as required.

This Commission's regulations provide that Louisiana ETC applications shall be evaluated under 47 U.S.C. § 214(e) and the relevant rules and orders of the FCC. The Commission also requires that ETC designation requests must meet the requirements identified in the Commission's *Public Interest General Order* dated May 20, 2004.⁹

REACH4 fulfills all of the federal and state requisite elements to receive ETC designation as set forth below.

A. REACH4 is a Common Carrier

For purposes of the ETC designation, REACH4 will operate as a common carrier and will offer interstate and intrastate communications on a common carrier basis in the RDOF census blocks.¹⁰ Designation as a common carrier is a prerequisite to REACH4's eligibility to receive RDOF support to provide voice and broadband internet services in the RDOF census blocks.¹¹

B. The Applicant Shall Offer Services Required by Statute

In accordance with 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.101(b), REACH4 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, including the following services: voice grade access to the public

⁹ 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*, Order released May 20, 2004.

¹⁰ Since the FCC has not classified voice services delivered over a voice over internet platform as telecommunications services, REACH4 reserves its rights to continue offering voice and other services outside of the RDOF supported areas as services not regulated under Title II of the Act or by this Commission.

¹¹ REACH4 hereby reserves its rights and notifies the Commission of its reservation of rights to object to jurisdictional, disclosure, relevance, due process, or other determinations outside of the Commission's authority including the Commission's regulation of internet and broadband services.

switched network or its functional equivalent and eligible broadband internet access services. Voice grade access to the public switched network shall include minutes of use for local services at no additional charge to end-users, access to the emergency services provided by local government or other public safety organizations (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. 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.¹²

C. REACH4 is a Facilities-Based Carrier

REACH4 is a facilities-based broadband internet access and voice service provider, with its own network, gateways, switching facilities, and other associated facilities. REACH4 will offer the RDOF supported services using its own facilities within the meaning of the FCC's rules or a combination of its own facilities and resale of another carrier's services within the RDOF census blocks. In Louisiana, REACH4 provides voice services as a competitive local exchange company by virtue of its Louisiana TSP certificate. *See Exhibit E.*

D. REACH4 Shall Provide Service Throughout the Designated Service Area

REACH4 will provide the supported services throughout the designated RDOF Auction awarded census blocks (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)). REACH4 also commits to provide service throughout this proposed designated service area to all customers making a reasonable request for service. REACH4 certifies that it will provide service on a timely basis to requesting customers within the proposed service area where REACH4's network already passes the potential customer's premises. REACH4 also certifies that it will provide service within a

¹² Service shall include capabilities that are incidental to and enable the operation of the telecommunications service. This does not include dial-up services.

reasonable period of time and within the buildout requirements established under the FCC's RDOF regulations.

E. REACH4 Will Advertise the Availability of Its Offerings and Charges

REACH4 will advertise the availability of its universal service offerings and charge for such offerings in the Louisiana RDOF awarded census blocks. Such advertising shall be made using the media of general distribution in accordance with 47 U.S.C. § 214(e)(1)(B) and 47 C.F.R. § 54.201(d)(2). An example of REACH4's advertising materials utilized on prior marketing campaigns is attached hereto as **Exhibit F**.

F. REACH4 Shall Make Lifeline Service Available

In accordance with 47 C.F.R. § 54.405, REACH4 shall make Lifeline service available 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. REACH4 will make an effort to notify the municipal, state, and federal governmental agencies who may have access to those who will likely benefit the most from REACH4's designation as a Louisiana ETC.

G. DESIGNATED SERVICE AREA

REACH4 requests Louisiana ETC designation to encompass the RDOF census blocks it was awarded, which are set forth in **Exhibit B**.¹³

H. EMERGENCY SITUATIONS

An ETC designated carrier 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. The ETC must also show that it is able to reroute traffic around damaged facilities and is capable of managing traffic spikes in emergency situations.

¹³ The incumbent carriers in these RDOF census blocks are AT&T, CenturyLink of Louisiana, LLC and Kaplan Telephone Company, Inc. d/b/a Pace Communications of Vermillion, *See Exhibit G*.

REACH4 submits that it has a reasonable amount of back-up power to ensure functionality of its services without a commercial power source, that it will be able to re-route traffic around any damaged facilities, and that it is able to manage demand spikes for the duration of a commercial power outage. Specifically, REACH4 is multi-homed, meaning that it has two separate internet circuits, each with a different upstream provider. Should one circuit fail, the REACH4 network routers automatically fail-over to the backup circuit. REACH4's main head, located in the office, has a natural gas powered generator with an automatic transfer switch. Should commercial power fail, battery backup units keep all network routers, servers, and switches powered on until the backup generator turns on within 15-20 seconds, thereby providing continuous uptime. Remote fiber facilities requiring power have enough battery backup to last two full days. Should power fail to be restored after two full days, REACH4 deploys and monitors portable backup generators until such time as the power is restored.

REACH4 is well positioned to satisfy and adequately respond to emergencies as encountered. REACH4's plans for emergency situations include activation, staffing, escalation, and communication protocols to identify and respond to each type of emergency. During emergencies, REACH4's management team is on 24-hour call to respond to the exigency, weather permitting. REACH4 inventories replacement routers and switches to quickly replace damaged equipment. All network and data servers are virtualized and backed up regularly. Backup copies of these virtualized servers are stored off-site.

I. REACH4 Will Satisfy Applicable Consumer Protect and Service Standards

In accordance with 47 C.F.R. § 54.202 (a)(3), a carrier seeking ETC approval must demonstrate that it will satisfy the applicable consumer protection and quality standards. REACH4 commits to comply with the applicable Commission and FCC rules concerning consumer

protection and service quality requirements. REACH4 also commits to comply with all annual reporting requirements for designated ETC's as applicable.

IV. REACH4'S FINANCIAL, MANAGERIAL, and TECHNICAL CAPABILITIES

As an RDOF recipient, REACH4 will provide, or in some instances has provided the FCC with audited financial statements, cost estimates, key assumptions that detailed proposed improvements to the REACH4 network over the buildout period in the proposed service area. REACH4 is a financially viable entity and will invest additional REACH4 dollars in addition to the RDOF funding investments. REACH4 is fully capable of providing the services described herein and possesses the technical and managerial experience to provide telecommunications in Louisiana. Information concerning REACH4's management team is contained within **Exhibit C**.

V. DESIGNATING REACH4 AS A LOUISIANA ETC IS IN THE PUBLIC INTEREST AND CONSISTENT WITH LOUISIANA AND FEDERAL LAW

REACH4 was a winning bidder in the FCC's RDOF reverse auction specifically winning the right to provide high-quality, innovative voice and broadband service to unserved populations in Acadia Parish, Louisiana. However, prior to receiving the funding, REACH4 must receive Commission approval. In reaching that decision, the Commission must first determine that the designation is in the public interest. The RDOF funding allocated for REACH4 will enable REACH4 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 REACH4 as an ETC will serve the public interest since REACH4 meets the requirements for designation as an ETC. In some instances, the new RDOF investments of REACH4 will be adjacent to current REACH4 facilities. This proximity will allow the RDOF related extension and expansion to be completed more quickly.

Competition furtherts the goals of telecommunications 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. Approving REACH4's Application for ETC status will enhance customer choice and increase competition and accordingly, is in the public interest. Additionally, as an FCC RDOF awardee who will build out unserved and underserved areas under the RDOF program, the granting of the required authorization will serve the public interest in by enabling such funding and the subsequent undertaking of such improvements.

Finally, granting this Application will satisfy the LPSC's thirteen-factor test set forth in the Public Interest General Order dated May 20, 2004. The Commission evaluates these factors on a case-by-case basis, application by application.¹⁴¹⁵

A. Granting This Application Will Lead to Increased Competitive Choices (Factor 1)

Approving this Application will lead to the availability of REACH4's RDOF supported broadband internet access and voice services and will have a transformative effect on the unserved and underserved areas in REACH4's RDOF census blocks. REACH4 is cognizant that Louisianans rely on voice and broadband services for their telecommunications needs. REACH4 is committed to expanding access to this life-changing technology to better enable rural customers to engage in remote education, healthcare/telemedicine, business, and other live streaming activities that are becoming more prevalent in a constantly evolving society. REACH4 understands that through its designation as an ETC, customer choice and opportunity to engage in such technological advances will be expanded through greater access to voice and broadband

¹⁴ 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*, Order released May 20, 2004.

¹⁵ The LPSC initially established these 13 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 REACH4, while others were eliminated by the Commission in subsequent orders.

telecommunications services in the RDOF census block areas. This increased competition will advance the goal of preserving and expanding universal service, and provide greater competitive choices.

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

The granting of this Application will not impact the high cost funding obligations of the Universal Service Fund (“USF”). First, RDOF funds assigned to REACH4 emanate from a different source than USF dollars. Second, the FCC recognized that “any increase in the size of the fund would be minimal and 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.”¹⁶ That is because the RDOF program will be funding through a different monetary funding source. Consequently, this factor weighs in favor of the Commission, granting REACH4 ETC authority for the requested census blocks.

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

As previously explained, if REACH4’s ETC Application is granted, REACH4 will deploy this capital in the designated rural census blocks to make available the voice and internet service called for under the RDOF award. Granting this Application will result in REACH4 continuing to invest capital to upgrade existing networks, creating new networks, and providing better service to citizens in rural Louisiana. Once RDOF funds are fully deployed, this in turn will expand available services and introduce competitive processes on rates, terms, and conditions of service between carriers offering comparable services based in rural Louisiana areas.

¹⁶ Application of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i), CC Docket No. 96-45, Order 20 FCC Red 15095 (2005) at ¶17.

D. Commitment to Quality Service (Factor 4)

REACH4 continues to be committed to enhancing service quality to its current and future Louisiana customers. As a home-grown Louisiana success story, REACH4's customers are frequently their friends, neighbors, and community members, so quality service underlies REACH4's very existence. Granting this Application will permit REACH4 to increase investment in network deployment and facilities, which will expand capacity on the network, and thus leading to better service quality for customers served and to be served by the new network facilities.

E. Submission of Records and Documentation, on a Quarterly Basis, Declaring that the 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)

REACH4 is committed to providing this Commission with updates on a reasonable basis regarding its use of RDOF funding received, roll out of network construction, and related progress undertaken in the Louisiana census blocks where it was awarded support.¹⁷

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 applies solely to wireless carriers. As REACH4 is not a wireless carrier, no response is required.

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

To the best of its ability, REACH4 will provide service to the public on a timely basis. In those instances where a request comes from a potential customer within the licensed service area

¹⁷ The Commission has previously proved to be flexible on such reporting deadlines/requirements, including revising reporting deadlines and modifying the frequency of same. See Order No. S-35070 (February 1, 2019) in *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).

but outside of its existing network coverage or authorized census blocks, REACH4 will work to provide service within a reasonable period of time. If REACH4 determines that it cannot reasonably serve a consumer, then it will report the unfulfilled request within thirty days after making such determination.¹⁸

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

REACH4 has in the past and will in the future maintain compliance with both federal and state requirements for providing E-911 services to its customers. Furthermore, REACH4 management has longstanding experience with the Acadia Parish 911 Staff and has a great working relationship with the Acadia's 911 Unit.

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

REACH4 submits that Section 401(B) applies solely to Commercial Radio Mobile Service Providers and Private Mobile Radio Service and therefore, is not applicable in the instant case.

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.

¹⁸ The FCC eliminated the requirement that ETCs report the number of service requests they receive but do not fulfill in its July 7, 2017 Report and Order. *See* WC Docket No. 10-90 and WC Docket No. 14-58 (In Re: In the Matter of Connect America Fund ETC Annual Reports and Certifications). REACH4 suggests that RDOF recipients be similarly relieved from any LPSC requirement.

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

REACH4 has been, and will continue to be, compliant with Sections 301A-C and 401 of the Commission's Regulations. REACH4 will send out a printed bill at least once a month unless the customer agrees to participate in electronic billing.¹⁹

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)

REACH4 is currently unaware of any additional ETC reporting requirements that have been imposed by the LPSC as a result of Docket R-27733. If the Commission enacts new requirements, pursuant to this docket, REACH4 intends that it will comply with same.²⁰

M. Rural Cream-Skimming Analysis (Factor 13)

The FCC revised 47 C.F.R. § 54.202, such that any "cream-skimming" analysis is no longer required. Furthermore, since REACH4 is neither seeking redefinition of a rural telephone company study nor is REACH4 a wireless carrier, a cream-skimming analysis is not necessary, nor required. In any event, since the Louisiana RDOF census blocks are characterized as high cost and unserved, there is no cream to skim.

VI. CERTIFICATION FOR USE OF UNIVERSAL SERVICE FUNDS

REACH4 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

¹⁹ LPSC General Order dated July 14, 2000 issued in Docket No.: U-24050, *In re: Rules and regulations concerning Telecommunications Service Provider ("TSP") billing*.

²⁰ LPSC Docket No. R-27733, *In re: Establishment of reporting requirements for Telecommunications Service Providers designated as Eligible Telecommunications Carriers ("ETCs")* Although opened by the Commission this docket has been dormant since 2006.

support is intended, in accordance with 47 U.S.C. § 254(e). REACH4 attaches to this Application, **Exhibit H** which is a verification underscoring the certifications.

VII. REQUEST FOR EXPEDITED TREATMENT

As noted, the FCC did not require that the RDOF Auction participants be designated as ETCs at the time they filed their application to participate in the Auction, the Agency did require that winning bidders obtain ETC status within 180 days of such announcement. Such ETC designation is required in the RDOF census block for which they were awarded FCC support. As previously indicated, REACH4 was selected as a winning bidder in the RDOF auction for certain Louisiana census blocks. REACH4 demonstrated that the approval of its Application is in the public interest as it will allow REACH4 to access high cost support funds to extend its services to underserved areas in these Louisiana census blocks. Since the timeframe for approval is compressed, REACH4 respectfully requests expedited consideration which will allow REACH4 to meet its requisite milestones. REACH4 therefore requests that this Commission enter an order approving the ETC approval no later than June 6, 2021.²¹ As part of expediting this Application, REACH4 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

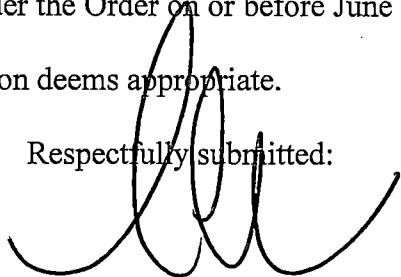
Granting REACH4's Application will serve the public interest for the reasons identified above. Such ETC status to this home grown Louisiana enterprise will result in the expansion of voice and broadband service in Acadia Parish, which REACH4 serves. The RDOF investment will also increase the number of providers serving the Louisiana census blocks, and allow

²¹ The Commission previously 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 15, 2018, Order rendered February 1, 2019.

REACH4 to receive RDOF Auction funds allocated to it and designated for Acadia Parish, Louisiana.


WHEREFORE, REACH4 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 issue an Order granting this Application and designate REACH4 as an ETC in its assigned RDOF census blocks; (3) render the Order on or before June 6, 2021; and (4) grant REACH4 such other relief as the Commission deems appropriate.

Respectfully submitted:



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Submitted this  of January, 2021.