

**Before the  
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie Siebin  
Joseph Sullivan  
Valerie Means  
Matt Schuerger  
John Tuma

Chair  
Vice Chair  
Commissioner  
Commissioner  
Commissioner

Application of Cable One VoIP LLC for )  
Designation as an Eligible )  
Telecommunications Carrier in the State of )  
Minnesota to Receive Rural Digital )  
Opportunity Fund (Auction 904) Support for )  
Voice and Broadband Services and to )  
Receive Federal Lifeline Support )  
\_\_\_\_\_ )

Docket No. \_\_\_\_\_

**SUMMARY OF FILING**

Cable One VoIP LLC submits this Application for Designation as an Eligible Telecommunications Carrier pursuant to Section 214(e)(2) of the federal Communications Act of 1934, as amended, the rules and regulations of the Federal Communications Commission, and the rules and regulations of the Minnesota Public Utilities Commission to obtain eligible telecommunications carrier designation to receive (1) Rural Digital Opportunity Fund support for the provision of voice and broadband services in certain Census Block Groups and (2) federal Lifeline-only support in other geographic areas of Minnesota.

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Receive Federal Lifeline Support )  
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Docket No. \_\_\_\_\_

**APPLICATION FOR DESIGNATION AS AN  
ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF MINNESOTA  
TO RECEIVE RURAL DIGITAL OPPORTUNITY FUND (AUCTION 904)  
SUPPORT FOR VOICE AND BROADBAND SERVICES  
AND TO RECEIVE FEDERAL LIFELINE SUPPORT**

Cable One VoIP LLC (the “Company”), by its attorneys, respectfully submits this Application for Designation as an Eligible Telecommunications Carrier (“Application”) pursuant to Section 214(e)(2)<sup>1</sup> of the federal Communications Act of 1934, as amended (the “federal Act”), the rules and regulations of the Federal Communications Commission (“FCC”),<sup>2</sup> and the rules and regulations of the Minnesota Public Utilities Commission (“Commission”).<sup>3</sup> The Company seeks eligible telecommunications carrier (“ETC”) designation to receive (1) Rural Digital Opportunity Fund (“RDOF”) support for the provision of voice and broadband services

<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.201, 54.202; *see also* AU Docket No. 20-34, *et al.*, *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021*, 35 FCC Rcd 13888 (2020); *Lifeline and Link Up Reform and Modernization; et al.*, 27 FCC Rcd 6656 (2012) (“*Lifeline Reform Order*”).

<sup>3</sup> Minnesota Rule 7812.1400.

in certain Census Block Groups and (2) federal Lifeline-only support in other geographic areas of Minnesota (collectively, the “Designated Service Area” as set forth in **Exhibit 1**).<sup>4</sup>

The Company’s parent, Cable One, Inc. (“Cable One”), was a member of a consortium that was selected as a winning bidder in the FCC’s RDOF auction (Auction 904). The Company’s receipt of RDOF funding is conditioned upon the Company obtaining and providing evidence of ETC designation for the RDOF portions of the Designated Service Area no later than June 7, 2021. In addition to seeking ETC designation for purposes of RDOF funding, entities also may seek Lifeline-only ETC designation in areas not eligible for high-cost support for the limited purpose of being eligible to receive Lifeline support (although recognizing the ETC will be obligated to provide Lifeline services throughout the entire designated area).<sup>5</sup>

As demonstrated herein, the Company meets all of the statutory and regulatory requirements for designation as an ETC in Minnesota. Accordingly, the Company respectfully requests the Commission grant it ETC status in the Designated Service Area on an expedited basis prior to the June 7, 2021 FCC deadline.<sup>6</sup>

In support of this Application, the Company states:

### **BACKGROUND**

1. The Company is a Delaware limited liability company with a principal place of business located at 210 E. Earll Drive, Phoenix, Arizona 85012. The Company is registered with

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<sup>4</sup> Exhibit 1 provides a description of the area for which designation is sought as required by Rule 7812.1400.4.E.

<sup>5</sup> *Public Notice* at n.72; *see also Wireline Competition Bureau Seeks Comment on Petitions for Designation as an Eligible Telecommunications Carrier for the Purpose of Becoming Eligible to Receive Connect America Fund Phase II Auction Support*, 33 FCC Rcd 9764 (2018) (“Recipients of high-cost support, including recipients of CAF support awarded pursuant to Auction 903, must offer the Lifeline discount on all qualifying services in areas where an ETC receives high cost support, deploy a network capable of delivering service that meets the Lifeline program’s minimum service standards, and commercially offer such service pursuant to its high-cost obligation.”).

<sup>6</sup> The Company requests the proposed effective date of the ETC designation occur before June 7, 2021. *See* Rule 7812.1400.4.C.

the Minnesota Secretary of State to conduct business in the state as shown in **Exhibit 2**. The Company will operate under the DBA name of “Sparklight” in Minnesota, which has been registered with the Minnesota Secretary of State as reflected in **Exhibit 2**. Attached as **Exhibit 3** is a current list of the Company’s officers, along with relevant biographical information.

2. The Company offers interconnected voice over Internet Protocol (“VoIP”) services in the state of Arizona. The Company has never been denied ETC designation by any state commission or by the FCC. The Company has an ETC application pending in Arizona and Idaho, and plans to file ETC applications in additional states in the upcoming weeks.

3. The Company is a wholly owned subsidiary of Cable One, a publicly traded Delaware corporation (NYSE: CABO), and Cable One is the sole member of the Company. Cable One and its subsidiaries provide cable/video, Internet access, broadband, and voice services in 21 states, including Minnesota. Other subsidiaries of Cable One also hold ETC designation in the states of Illinois, Missouri, and Oklahoma.

4. In January 2020, the FCC adopted the framework and rules for Phase I of the RDOF auction (Auction 904) to connect millions of rural homes and small businesses to fixed high-speed broadband networks.<sup>7</sup> The FCC designed Phase I of the auction to award up to \$16 billion over 10 years to service providers that commit to offer voice and broadband services to fixed locations in eligible unserved high-cost Census Block Groups. The framework for the RDOF builds upon the FCC’s successful Connect America Fund Phase II (CAF-II) auction that was completed in 2018.<sup>8</sup>

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<sup>7</sup> *Rural Digital Opportunity Fund, et al.*, 35 FCC Rcd 686 (2020) (“*RDOF Order*”).

<sup>8</sup> The Commission conducted numerous ETC designation proceedings in connection with the CAF-II auction. *See generally, e.g.*, Docket No. P-999/CI-18-634.

5. The Company's parent, Cable One, participated in Auction 904 as a member of the Wisper-CABO 904 Consortium (the "Consortium"). On December 7, 2020, the FCC issued the *Public Notice* announcing the results of Auction 904, and the Consortium was the winning bidder in numerous states, including Minnesota.<sup>9</sup> Pursuant to the FCC's process for distributing winning bids among related entities,<sup>10</sup> the Consortium assigned the Company as the entity to receive RDOF support for the winning bids in the state of Minnesota. The Company was designated as the entity to fulfill the public interest obligations associated with receiving RDOF support for Minnesota in the long-form application (FCC Form 683) filed with the FCC.

6. The FCC's *Public Notice* also established several deadlines in connection with Auction 904. The FCC requires the Company to provide documentation to the FCC no later than 6:00pm Eastern on June 7, 2021, showing the Company has been designated as a high-cost ETC for the Census Block Groups the Company will receive RDOF support.<sup>11</sup> An officer of the Company also is required to certify to the FCC on that date that the ETC designation covers all of the Census Block Groups for which the Company will receive RDOF support.

7. Pleadings, orders, notices, and other correspondence filed in this matter should be served upon:

Patrick Caron  
Assistant General Counsel  
Cable One, Inc.  
210 E. Earll Drive  
Phoenix, Arizona 85012  
602-364-6000 (telephone)  
Patrick.Caron@cableone.biz

Chérie R. Kiser  
Angela F. Collins

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<sup>9</sup> *Public Notice*, Attachment A at 29-30.

<sup>10</sup> *Public Notice* ¶¶ 9-14.

<sup>11</sup> *Public Notice* ¶ 17.

Cahill Gordon & Reindel LLP  
1990 K Street, N.W., Suite 950  
Washington, D.C. 20006  
202-862-8900 (telephone)  
212-269-5420 (facsimile)  
ckiser@cahill.com  
acollins@cahill.com

The above-referenced individuals agree to receive all Commission notices and orders regarding this proceeding via electronic mail.

**INFORMATION REQUIRED FOR ETC DESIGNATION**

8. Section 214(e)(1) of the federal Act, the FCC's rules, and the Commission's rules set forth certain requirements for ETC designation.<sup>12</sup> The Company meets each of these requirements.

9. FCC Rule 54.201(c); FCC Rule 54.202(b); Rule 7812.1400.2. An ETC applicant must demonstrate the ETC designation is consistent with the public interest, convenience, and necessity, and in the case of an area served by a rural telephone company, demonstrate the public interest will be met by an additional designation. Designation of the Company as an ETC will serve the public interest, convenience, and necessity. ETC designation will permit the Company to use RDOF support to offer voice and broadband services in the Designated Service Area, which consists of unserved, high-cost areas of Minnesota, and to provide Lifeline services to low-income consumers. The Company will invest in facilities and equipment in the Designated Service Area. The planned investment and deployment in the Designated Service Area will further the goals of the Commission and the FCC by expanding the reach of digital connectivity to promote economic growth in rural areas and ensure quality communications services are

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<sup>12</sup> 47 U.S.C. § 214(e)(1); 47 C.F.R. §§ 54.201, 54.202; Minnesota Rule 7812.1400.

available at “just, reasonable, and affordable rates.”<sup>13</sup> As the FCC has observed, “an important goal of the [federal] Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”<sup>14</sup>

10. Minnesota Rule 7812.1400.4.F. An ETC applicant must demonstrate why the requested designation satisfies the requirements for receiving universal service support under Minnesota Rule 7812.0700, which contains certain general service quality standards. The Company, its parent Cable One, and its affiliates have a long history of commitment to quality of service in Minnesota and other states. The Company commits to complying with the requirements of Minnesota Rule 7812.0700 to the extent applicable to the Company’s universal service-supported service offerings in the Designated Service Area.

11. FCC Rule 54.201(d). Federal law requires an ETC applicant to be a “common carrier.”<sup>15</sup> The Company will provide broadband Internet access service and voice service in the Designated Service Area. The Company will provide voice service as an interconnected VoIP service provider on a common carrier basis to customers and locations for which the Company is receives RDOF and Lifeline-only support.

12. FCC Rule 54.201(d)(1); FCC Rule 54.201(i). An ETC applicant must demonstrate that it is capable of providing and will continuously provide the supported services throughout the service area either by using its own facilities or a combination of its own facilities and the resale of another carrier’s services. The Company certifies it will offer the services that are supported by the federal universal service support mechanisms in the Designated Service

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<sup>13</sup> 47 U.S.C. § 254(b)(1).

<sup>14</sup> *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

<sup>15</sup> 47 C.F. R. §54.201(d); *see also* 47 U.S.C. § 153(11).

Area either using its own facilities or a combination of its own facilities and the resale of another carrier's services.

13. Under current FCC rules, two services are supported by the federal universal service support mechanisms: (1) voice telephony services; and (2) broadband Internet access services.<sup>16</sup> Eligible voice telephony services must provide voice grade access to the public switched telephone network ("PSTN") or its functional equivalent, minutes of use for local service provided at no additional charge, access to emergency 911 and enhanced 911 service in locations where implemented, and for qualifying low-income consumers, toll limitation service.<sup>17</sup> Eligible broadband Internet access services must provide the capability to transmit 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.<sup>18</sup>

14. The Company certifies that it will offer voice and broadband services in the Designated Service Area that satisfy the FCC's requirements. The Company's voice offering will provide voice grade access to the PSTN, and will include unlimited local calling. In addition, the Company's voice offering will provide consumers with access to 911 and enhanced 911 to the extent local governments have implemented such services. With respect to toll limitation service, the FCC eliminated the requirement to provide toll limitation services if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.<sup>19</sup> As explained below, the Company is not required to provide toll limitation service in

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<sup>16</sup> 47 C.F.R. § 54.101.

<sup>17</sup> 47 C.F.R. § 54.101(a)(1).

<sup>18</sup> 47 C.F.R. § 54.400(l).

<sup>19</sup> *Lifeline Reform Order* ¶ 49.



connection with its Lifeline service offering because the Company plans to offer a Lifeline voice plan with unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area.

15. Similarly, the Company's broadband Internet access service offering will provide consumers with the capability to transmit data to and receive data from all or substantially all Internet endpoints. The Company's broadband Internet access service offering will meet the minimum service standards required by the FCC's rules,<sup>20</sup> and for the receipt of RDOF funding.<sup>21</sup>

16. The Company will use a combination of its own facilities and the facilities of other providers to offer the supported services in the Designated Service Area. Under FCC rules, facilities are the ETC's "own" if the ETC has exclusive right to use the facilities to provide the supported services or when service is provided by any affiliate within the holding company structure.<sup>22</sup> Further, pursuant to FCC requirements, the Company will submit detailed information to the FCC regarding the Company's intended technology and system design for the provision of RDOF-funded services in the Designated Service Area, including network diagrams certified by a professional engineer.<sup>23</sup>

17. FCC Rule 54.201(d)(2); FCC Rule 54.405(b)-(d). An ETC applicant must demonstrate that it will advertise the availability of its offering and service charges using media of general distribution. The Company will publicize the availability of its voice and broadband

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<sup>20</sup> 47 C.F.R. § 54.408.

<sup>21</sup> *RDOF Order* ¶¶ 31, 33.

<sup>22</sup> *See, e.g., WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, 33 FCC Rcd 6696, nn. 23-24 (2018).

<sup>23</sup> *Public Notice* ¶¶ 16-17.

service offerings throughout the Designated Service Area using media of general distribution.<sup>24</sup> The Company will use a combination of digital and traditional media, such as the Internet, outbound email, outdoor advertising, radio advertising, newspaper and magazine advertising, and direct marketing materials. The Company also will rely on the marketing practices and advertising expertise of Cable One to advertise the availability of its service offerings in the Designated Service Area.

18. The Company will publicize the availability of its Lifeline service offerings in the Designated Service Area in a manner reasonably designed to reach those likely to qualify for the service.<sup>25</sup> Using easily understood language, the Company will indicate on all materials describing its Lifeline service that: (1) it is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; and (5) the program is limited to one discount per household.<sup>26</sup> The Company also will disclose its name or its DBA name on all materials describing the Lifeline service.<sup>27</sup>

19. FCC Rule 54.201(h); FCC Rule 54.202(a)(4). An ETC applicant seeking to provide Lifeline services must demonstrate it is financially and technically capable of providing Lifeline service in compliance with the FCC's rules. The FCC has stated that the "relevant considerations" for satisfying this requirement are whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to

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<sup>24</sup> 47 C.F.R. § 54.201(d)(2).

<sup>25</sup> 47 C.F.R. § 54.405(b).

<sup>26</sup> 47 C.F.R. § 54.405(c). For these purposes, the term "materials describing the service" includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms. *See id.*

<sup>27</sup> 47 C.F.R. § 54.405(d).

enforcement action or ETC revocation proceedings in other states.<sup>28</sup>

20. The Company is financially and technically capable of offering Lifeline services in the Designated Service Area. The Company's parent and affiliates have been offering services in Minnesota and several other states for many years. Cable One also can provide the Company with financial and technical support as needed, and the Company will utilize the same management and day-to-day operational personnel.<sup>29</sup> The Company currently provides non-Lifeline voice services in Arizona; it will not rely exclusively on universal service fund disbursements to operate. Finally, the Company has not been subject to enforcement action or ETC revocation proceedings in any state.

21. FCC Rule 54.202(a)(1). An ETC applicant must certify that it will comply with the service requirements applicable to the support it receives, and submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. The Company certifies that it will comply with the service requirements applicable to receipt of RDOF and Lifeline support in the covered Designated Service Area. As a condition of receiving RDOF support, the Company also must meet certain service milestones and buildout requirements in the Designated Service Area.<sup>30</sup> A five-year network improvement plan is no longer necessary for entities seeking Lifeline-only designation.<sup>31</sup> Further, the FCC has waived the requirement for a winning bidder in Auction 904 to file a five-year network improvement plan as part of the ETC designation process.<sup>32</sup>

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<sup>28</sup> *Lifeline Reform Order* ¶ 388.

<sup>29</sup> The Company's financial reporting is consolidated with its parent Cable One. Financial information concerning Cable One can be found at: <https://ir.cableone.net/corporate-profile/default.aspx>.

<sup>30</sup> *RDOF Order* ¶ 45.

<sup>31</sup> *Lifeline Reform Order* ¶ 386.

<sup>32</sup> *Public Notice* at n.71 (applying the same waivers previously applied to ETC designations for the CAF-II auction to ETC designations for Auction 904).

22. FCC Rule 54.202(a)(2). An ETC applicant must demonstrate that it can remain functional in emergency situations. The Company certifies it will have the ability to remain functional in emergency situations in the Designated Service Area. The Company has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Separate FCC rules also require the Company to implement certain back-up power requirements.<sup>33</sup> In addition, the Company will be able to rely on Cable One's disaster recovery contingency plans such as the use of diverse/alternate routing, electronics redundancy, redundant data centers, geographically separated operations, and environmental controls for data and switching centers to remain functional in an emergency situation.

23. FCC Rule 54.202(a)(3). An ETC applicant must certify that it will comply with all applicable service quality standards and consumer protection rules.<sup>34</sup> The Company certifies that it will comply with service quality standards and consumer protection rules applicable to its provision of service in the Designated Service Area.

24. FCC Rule 54.202(a)(5); FCC Rule 54.202(a)(6). FCC rules require Lifeline applicants to provide information describing the terms and conditions of voice telephony service and broadband Internet access service plans to be offered to Lifeline subscribers. For Lifeline services, the FCC has determined that providers may satisfy the obligation to provide local usage via service offerings that bundle local and long distance minutes.<sup>35</sup>

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<sup>33</sup> 47 C.F.R. § 9.20.

<sup>34</sup> The FCC has waived the requirement for a winning bidder in Auction 904 to demonstrate that it will satisfy consumer protection and service quality standards as part of the ETC designation process. *See Public Notice* at n.71 (applying the same waivers previously applied to ETC designations for the CAF-II auction to ETC designations for Auction 904).

<sup>35</sup> *Lifeline Reform Order* ¶ 49.

25. At this time, the Company plans to offer service plans that include high-speed Internet access service and unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area. The Company also will offer standalone voice services as required by the FCC.<sup>36</sup> The Company has not yet determined the specific details of its service offerings and associated rates to be offered in the Designated Service Area. The Company is conducting market research in the Designated Service Area to determine what mix of services potential customers prefer. The Company will make services available based on customer demand in each market. Further, the Company's pricing will be reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements.<sup>37</sup> By way of example, the FCC's 2021 urban average monthly rate is \$33.73, and the reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.75.<sup>38</sup> Accordingly, each ETC providing fixed voice service must certify to the FCC in July 2021 that the pricing of its basic residential voice services is no more than \$54.75. The FCC has adopted similar benchmarks for broadband Internet access service, which vary based on the speed and usage allowance.<sup>39</sup>

26. FCC Rule 54.405(a). An ETC providing Lifeline services must make Lifeline service available to qualifying low-income consumers. The Company certifies that its Lifeline service offering will conform to the definition of "Lifeline" in the FCC's rules.<sup>40</sup>

27. FCC Rule 54.405(e). An ETC providing Lifeline services must implement certain

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<sup>36</sup> RDOF Order ¶ 42.

<sup>37</sup> RDOF Order ¶ 42.

<sup>38</sup> WC Docket No. 10-90, *Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers*, 35 FCC Rcd 13667 (rel. Nov. 30, 2020) ("*Comparability PN*").

<sup>39</sup> *Comparability PN* at 3.

<sup>40</sup> 47 C.F.R. § 54.401(a).

de-enrollment procedures for Lifeline customers. The Company certifies it will comply with the FCC's de-enrollment procedures and will have general de-enrollment procedures in place for Lifeline services. In accordance with FCC requirements, the Company will de-enroll Lifeline customers for no longer qualifying for Lifeline service, for duplicative support, for non-usage, for failure to re-certify, and when requested by the Lifeline customer.

28. FCC Rule 54.409; FCC Rule 54.410. The Company certifies that it will verify the eligibility of its Lifeline subscriber base in accordance with FCC rules. The Company also will establish processes for ensuring Lifeline services are provided only to eligible customers, including procedures for confirming consumer eligibility, enrolling eligible customers, re-certifying eligibility at regular intervals, and recordkeeping.

**CONCLUSION**

WHEREFORE, for the foregoing reasons, the Company respectfully requests that the Commission designate it as an ETC for the provision of voice and broadband services in the Designated Service Area on an expedited basis to occur prior to June 7, 2021.

Dated: March 8, 2021

Respectfully submitted,

**CABLE ONE VOIP LLC**

*/s/ Patrick N. Caron*

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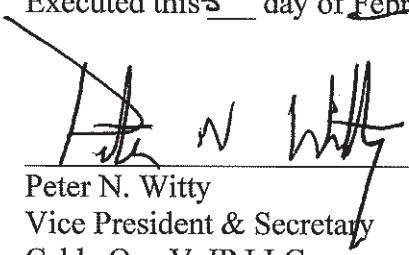
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Its Attorneys

**VERIFICATION**

I, Peter N. Witty, hereby state that I am the Vice President & Secretary of Cable One VoIP LLC (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing Application was prepared under my direction and supervision; and that the contents of the foregoing Application are true and correct to the best of my knowledge, information, and belief.

Executed this <sup>5<sup>th</sup></sup> day of ~~February~~ <sup>MARCH</sup> 2021.

  
\_\_\_\_\_  
Peter N. Witty  
Vice President & Secretary  
Cable One VoIP LLC



**EXHIBITS**

**Exhibit 1    Designated Service Area**

**Exhibit 2    Secretary of State Documentation**

**Exhibit 3    Officers**

**EXHIBIT 1**  
**Designated Service Area**

**RDOF Service Areas**

<b><u>County</u></b>	<b><u>Census Block Group</u></b>
Clay	270270201003
Clay	270270203004

**Additional Lifeline-Only Service Areas**

(the following franchise areas may include the Census Block Groups covered by the RDOF service area listed above, but Lifeline-only service will be offered only in those areas not covered by the RDOF service area)

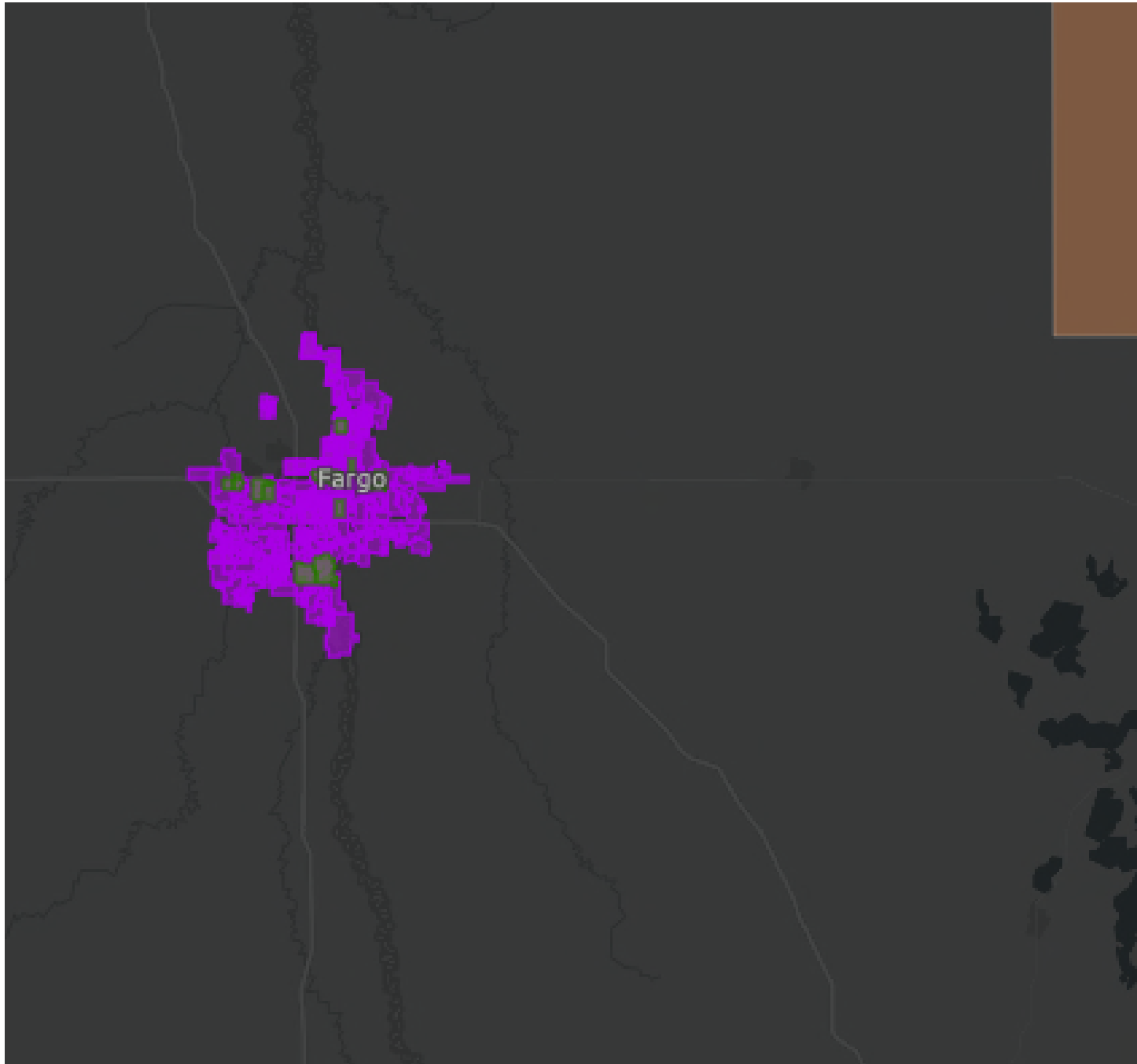
<b><u>FRANCHISE AREA</u></b>	<b><u>COUNTY</u></b>
Dilworth	Clay
Moorhead	Clay
Oakport	Clay

**Maps of Designated Service Area**

(includes both RDOF Census Block Groups and Lifeline-only areas)

Purple shows the current franchise areas served by Cable One, Inc. in Minnesota, which will be the geographic areas in which the Company will offer Lifeline-only service.

Green shows the boundaries of the Census Block Groups awarded in the RDOF auction (Auction 904).



**EXHIBIT 2**  
**Minnesota Secretary of State Documentation**

**Office of the Minnesota Secretary of State  
Certificate of Good Standing**

I, Steve Simon, Secretary of State of Minnesota, do certify that: The business entity listed below was filed pursuant to the Minnesota Chapter listed below with the Office of the Secretary of State on the date listed below and that this business entity is registered to do business and is in good standing at the time this certificate is issued.

Name: Cable One VoIP LLC  
Date Filed: 01/14/2021  
File Number: 1210501900023  
Minnesota Statutes, Chapter: 322C  
Home Jurisdiction: Delaware

This certificate has been issued on: 01/14/2021



*Steve Simon*

Steve Simon  
Secretary of State  
State of Minnesota



Steve Simon

Office of Minnesota Secretary of State

**STATE OF MINNESOTA**

1/14/2021

Dear Sparklight,

Thank you for your business filing with the Office of the Minnesota Secretary of State. Minnesota has a very robust and exciting business community, and our office looks forward to assisting you in the future.

I have included an additional business resource document below that would be a helpful reference for you.

I encourage you to stay connected to our Business Services division by subscribing to receive important announcements and updates. To receive the announcements and updates, [visit our online subscribe page](#).

If our office can be of further assistance, please do not hesitate to contact our Business Services helpdesk at [business.services@state.mn.us](mailto:business.services@state.mn.us).

Sincerely,

A handwritten signature in black ink that reads "Steve Simon".

Steve Simon

Secretary of State  
State of Minnesota

**EXHIBIT 3**  
**Officers of Cable One VoIP LLC**

As of January 1, 2021, the following are the officers of Cable One VoIP LLC:

**Julia M. Laulis, President & Chief Executive Officer**

Laulis joined Cable One in 1999 as Director of Marketing-NW Division. In 2001, she was named Vice President of Operations for the SW Division. In 2004, she became responsible for starting Cable One's Phoenix Customer Care Center. Laulis was named Chief Operations Officer in 2008, responsible for the company's three operation divisions and two call centers. In 2012, Laulis was named Chief Operating Officer, adding sales, marketing, and technology to her responsibilities. In 2015, Laulis was promoted to President and Chief Operating Officer of Cable One. In 2017, she was named President and Chief Executive Officer and in 2018 she was named Chair of the Board. Prior to joining Cable One, Laulis was with Jones Communications in the Washington, DC area and Denver, where she served in various marketing management positions. Laulis began her 35-year career in the cable industry with Hauser Communications. Laulis graduated from Indiana University in Bloomington with a bachelor's degree in Telecommunications. She attended the Woman in Cable Television Betsy Magness Leadership Institute in 1998/1999 and graduated from the Program for Management Development at the Harvard Business School in 2002. Cable FAX Magazine has named Laulis one of the Most Powerful Women in Cable for the past 10 years running. Laulis currently serves on the boards of The AES Corporation, CableLabs, The Cable Center, and C-SPAN and is a trustee of the C-SPAN Education Foundation.

**Michael E. Bowker, Vice President**

Mike Bowker is Chief Operating Officer for Cable One. He is responsible for overseeing Cable One's daily operations, technology, and residential and business channels. Bowker joined Cable One in 1999 as Advertising Regional Sales Manager. He is a member of the team that successfully launched the commercial sales division and the residential inbound sales call center. Bowker has been a Vice President of Cable One since 2005. He was named Vice President of Sales in 2012 and was promoted to Senior Vice President, Chief Sales and Marketing Officer in 2014. Prior to joining Cable One, Bowker was with AT&T Media Services and TCI Cable, where he served in various sales management positions. A native of Boise, Idaho, Bowker holds a bachelor's degree in Communication from Boise State University and is a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Bowker currently serves as Vice Chairman of ACA — America's Communications Association.

### **Steven S. Cochran, Vice President**

Steven Cochran is Senior Vice President and Chief Financial Officer at Cable One. He is responsible for the areas of accounting, reporting, finance, and investor relations. A veteran of the cable industry, Cochran spent 15 years at Wide Open West (WOW), a Denver-based cable operator. During his tenure at WOW, Cochran held positions of increasing responsibility, including Chief Financial Officer, Chief Operating Officer, and President and Chief Executive Officer. Prior to WOW, Cochran was Senior Vice President and Chief Financial Officer at Millennium Digital Media. Cochran holds a master's degree in accounting science and a bachelor's degree in economics from the University of Illinois—Urbana Champaign

### **Jarrold L. Head, Vice President**

Jarrold Head is Vice President of Engineering and Construction for Cable One. He is responsible for outside plant engineering, design and construction. Before joining Cable One, Head served as Vice President of Engineering & Technical Operations for Fidelity Communications and its subsidiaries. Prior to that position, he served as Engineering Director for Fidelity, overseeing Engineering and Network Operation teams to design, implement and support Fidelity's advanced technology services. Head holds a bachelor's degree in Electrical Engineering from Missouri University of Science and Technology.

### **Kenneth E. Johnson, Vice President**

Ken Johnson is Senior Vice President of Technology Services at Cable One. He is responsible for the strategic evolution of technology roadmaps related to products, as well as Information Technology, and Network & Engineering. Before joining Cable One, Johnson served as Chief Operating Officer and Chief Technology Officer for NewWave Communications. Prior to NewWave, Johnson was Chief Technology Officer for SureWest Communications and Everest Connections. Originally from Lenexa, Kansas, Johnson holds a bachelor's degree in Computer and Information Sciences from Friends University. Johnson currently serves on the board of the National Cable Television Cooperative.

### **Eric M. Lardy, Vice President & Assistant Secretary**

Eric Lardy is Senior Vice President of Operations and Integration for Cable One. He is responsible for overseeing the company's day-to-day operations, acquisition integration and long-term strategic operating plans. A more than 20-year veteran in the cable industry, Lardy joined Cable One as a Pay-Per-View Manager in the Fargo, North Dakota cable system. He was later promoted to Internet Business Manager, launching dial-up and high-speed broadband services. Lardy relocated several times and held a variety of positions in Marketing, Operations, and system General Management before being promoted to Director of New Products and Service Projects in 2012. In 2014, he was named Vice President of Strategy and Finance. In 2017, he was promoted to Senior Vice President, adding oversight of human resources and business intelligence to his responsibilities. Lardy holds bachelor's degrees in Marketing and International Business from Minnesota State University and an MBA from Arizona State University.



**Raymond L. Storck, Jr., Vice President & Treasurer**

Ray Storck is Vice President of Finance and Treasurer for Cable One. He is responsible for all of the company's accounting functions. Before joining Cable One, Storck served as Controller at Kona Grill. Prior to that, Storck was Vice President/Controller and then Chief Financial Officer for MicroAge. Following MicroAge, Storck spent 4 years at PetSmart where he served as Vice President/Controller and then Vice President of Finance and Chief Accounting Officer. A native of Iowa, Storck holds a bachelor's degree in Accounting from the University of Northern Iowa.

**Peter N. Witty, Vice President & Secretary**

Peter N. Witty is Senior Vice President, General Counsel and Secretary for Cable One. He is responsible for overseeing the company's legal, regulatory and compliance functions. Witty has more than 20 years of legal experience. Before joining Cable One, he served as General Counsel and Secretary for Gas Technology Institute (GTI), a leading energy research, development and training organization. Prior to GTI, Witty spent 10 years with Abbott Laboratories, serving in various positions, including as Senior Counsel and Division Counsel. Witty also previously practiced law as an associate at Latham & Watkins LLP and Ross & Hardies (now McGuireWoods LLP). Witty holds a Juris Doctor from Notre Dame Law School and a bachelor's degree in aerospace engineering from the University of Notre Dame. He is also a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Prior to attending law school, Witty was an officer and helicopter pilot in the 101st Airborne Division (Air Assault), where he served during Operations Desert Shield/Desert Storm.

Additional information on the officers and directors of the Company's parent, Cable One, Inc., can be found at: <https://ir.cableone.net/corporate-information/officers-directors/default.aspx>.

**CERTIFICATE OF SERVICE**

Application of Cable One VoIP LLC for )  
Designation as an Eligible )  
Telecommunications Carrier in the State of )  
Minnesota to Receive Rural Digital )  
Opportunity Fund (Auction 904) Support for )  
Voice and Broadband Services and to )  
Receive Federal Lifeline Support )  
\_\_\_\_\_ )

Docket No. \_\_\_\_\_

I hereby certify that on March 8, 2021, I caused the foregoing Application of Cable One VoIP LLC for Designation as an Eligible Telecommunications Carrier to be served via eService, electronic mail, or postage prepaid United States first class mail, to the following:

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission

Linda Chavez  
Minnesota Department of Commerce

Office of Attorney General – Residential Utilities Division (OAG-RUD)

Minnesota Public Utilities Commission General Service List

/s/ Angela F. Collins  
Angela F. Collins