

April 20, 2021

Via Electronic Filing

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E, Suite 350
Saint Paul, MN 55101

Re: Docket No. P-7055/M-21-161

Dear Mr. Seuffert:

Cable One VoIP LLC d/b/a Sparklight (the “Company”) respectfully submits this amended response to the Notice of Request for Additional Information (“Notice”) issued by the Minnesota Public Utilities Commission (“Commission”) in the above-referenced docket concerning the Company’s Application for Designation as an Eligible Telecommunications Carrier in Minnesota (the “Application”). The Company filed its original response to the Notice on April 19, 2021, and files this amended response to include the Company’s response to Question #6.¹

As stated in the Application, the Company seeks eligible telecommunications carrier (“ETC”) designation from the Commission to receive (1) Rural Digital Opportunity Fund (“RDOF”) support for the provision of voice and broadband services in certain Census Block Groups pursuant to Federal Communications Commission (“FCC”) Auction 904 and (2) federal Lifeline-only support in other geographic areas of Minnesota (collectively, the “Designated Service Area” as set forth in Exhibit 1 of the Company’s Application).

The Company provides the following responses to the Additional Information Requested from ETC Petitioners in the format requested by the Commission:

¹ Question #6 inadvertently was excluded from the Notice. Commission staff provided Question #6 to the Company via email.

ETC Applicant Name: Cable One VoIP LLC d/b/a Sparklight (the “Company”)		
MPUC Docket No. P-7055/M-21-161		
Commission Information Request	Yes (Certify)/No	Additional Information (Attach additional pages as necessary)
1. Please certify the applicant’s commitment to meeting the service and performance quality requirements applicable to its support type. See 47 C.F.R. § 54.202(a)(1).	Yes	The Company certifies that it will meet the service and performance requirements applicable to RDOF and Lifeline support in the Designated Service Area. <i>See</i> Company Application ¶ 21.
2. Will the applicant offer standalone voice telephony service? See 47 CFR 54.101(b). Applicants holding an ETC designation in MN should describe, in sufficient detail to understand the offering, their existing voice telephony service offered to customers, including tariff sheets and contracts, proof of making offerings for this service to consumers in their existing census blocks covered by their present ETC designation, and the number of customers using the applicant’s offered voice telephony service in both total numbers and as a percent of customers served in the state. Indicate whether the offering for the RDOF census blocks covered by this application will be the same standalone service and if not, describe how it will differ. See 47 CFR 54.101(b).	Yes	The Company certifies it will offer standalone voice service in the Designated Service Area. <i>See</i> Company Application ¶ 25. The Company will offer voice service as interconnected Voice over Internet Protocol (“VoIP”) service. The Company is not an existing ETC in Minnesota, but provides an overview of its proposed voice service plans in Exhibit 1 hereto. The Company will offer the same standalone voice service in both its RDOF-supported service area and its Lifeline-only service area.

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Commission Information Request	Yes (Certify)/No	Additional Information (Attach additional pages as necessary)
3. If so, will the applicant do so through its own facilities, meaning “any physical components of the telecommunications network that are used in the transmission or routing of the services designated for support” or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier)? See 47 CFR 54.201(d)(1).	Yes	The Company certifies it will use a combination of its own facilities and the facilities of other providers to offer the supported services in the Designated Service Area. <i>See</i> Company Application ¶ 16. 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. The Company will provide the supported services using the existing facilities-based network of its parent Cable One, Inc. (“Cable One”) as well as new network facilities to be deployed, including a combination of aerial and underground facilities to create a fixed, facilities-based network capable of offering the supported services in the Designated Service Area.
4. For the voice telephony service, identify the customer point of contact (name, address, contact information), and confirm this contact person is legally authorized to represent the applicant in communications with customers.	Yes	The Company certifies the following contact person is legally authorized to represent the Company in communications with Minnesota customers: Emerson Yearwood Associate General Counsel - Regulatory Affairs Cable One VoIP LLC d/b/a Sparklight 210 E. Earll Drive Phoenix, AZ 85012 602-364-6000 Emerson.Yearwood@cableone.biz

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Commission Information Request	Yes (Certify)/No	Additional Information (Attach additional pages as necessary)
5. Does the voice telephony service have "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 area has implemented 911 or enhanced 911 systems"? See 47 CFR § 54.101(a).	Yes	The Company certifies the Company’s voice service will provide access to 911/E-911. <i>See</i> Company Application ¶ 14. As explained to the Minnesota Department of Commerce in e-mail correspondence, the Company has entered into a contract with a third-party telecommunications carrier to support its provision of interconnected VoIP service in Minnesota (and other states). Pursuant to that contract, the third-party telecommunications carrier provides all services and functions related to the public switched telephone network (“PSTN”), including access to 911/E911.

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6. Please describe how the applicant will remain functional in emergency situations, namely, what is “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.” 47 CFR § 54.202(a)(2)?	Yes	The Company certifies it will remain functional in emergency situations. <i>See</i> Company Application ¶ 22. 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. In addition, as a subsidiary of Cable One, 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. Cable One maintains geo-diverse data centers, which house back office and customer support systems. Cable One’s network interconnects with transit and peering organizations at six georedundant locations across the United States, which makes the network highly redundant and provides full failover capacity should any site become unavailable. Further, as a provider of interconnected VoIP service, the Company also is subject to FCC requirements regarding back-up power. Under FCC Rule 9.20, any provider of a facilities-based, fixed voice service offered as residential service that is not line-powered must offer subscribers the option to purchase backup power for the voice service, and must make certain annual disclosures regarding the availability of such backup power options.

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7. Please describe the extent to which the offered voice telephony services will be offered at “rates that are equal or lower to the Commission’s reasonable comparability benchmarks for fixed wireline services offered in urban areas.” 47 CFR 54.804(b)(2)(iii).	Yes	The Company certifies the pricing of the Company’s voice service will be reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements. <i>See</i> Company Application ¶ 25.
8. Will the applicant satisfy additional requirements applicable to all high-cost ETCs, such as Lifeline obligations? 47 CFR § 54.405	Yes	The Company certifies that it will comply with the additional requirements applicable to all high-cost ETCs under FCC rules. <i>See</i> Company Application ¶¶ 17-18, 26-27.
9. If so, will the applicant commit to e-file documentation evidencing the offering of Lifeline service in the required census blocks as required by 47 CFR § 54.405(b). a. Current Lifeline providers should provide evidence of prior and current communications, including advertisements and website communications as described in 47 CFR § 54.405(c) for census blocks for which it currently receives support and the number of Lifeline customers being served. b. Future Lifeline providers should provide planned communications as described in 47 CFR §54.405(c).	Yes	The Company is not an existing ETC in Minnesota, but certifies it will e-file documentation evidencing its advertising of Lifeline service in Minnesota in the future, and prior to the initiation of Lifeline service in Minnesota. The Company is not authorized to offer Lifeline service in any state, and thus does not currently advertise the availability of Lifeline. The Company understands its obligations to advertise the availability of its RDOF-supported and Lifeline services throughout the Designated Service Area. <i>See</i> Company Application ¶¶ 17-18. One of the Company’s affiliates holds ETC designation to provide Lifeline in Missouri and Oklahoma, and the affiliate’s website provides a good example of what the Company will utilize in the future to advertise Lifeline service. ²

² The website can be found here: <https://www.fidelitycommunications.com/lifeline>.

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10. If the answer to question 3 above is through an affiliate or by offering a managed voice solution (including VoIP) through resale of another carrier’s services, identify the other carrier, describe the legal relationship between the applicant and the other carrier, and describe how the other carrier will comply with the requirements listed above.	Yes	See response to Question 3 above. The Company will use a combination of its own facilities and the facilities of its parent, Cable One, Inc. to provide the supported services in the Designated Service Area.
11. Will the applicant commit to notifying the Minnesota Public Utilities Commission, Minnesota Department of Commerce and the Minnesota Office of the Attorney General if it has failed to meet its milestones for the identified census blocks under the FCC RDOF grant obligations? 47 CFR 54.320(d).	Yes	The Company certifies that it will notify the Commission, the Minnesota Department of Commerce, and the Minnesota Office of Attorney General if it fails to meet its milestones for its buildout obligations under its RDOF grants for Minnesota.

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If you have any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Patrick N. Caron

Patrick N. Caron (MN Bar No. 0386602)
Assistant General Counsel
Cable One VoIP LLC d/b/a Sparklight

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cc: Certificate of Service

EXHIBIT 1
Service Plan Information

The Company plans to offer the following standalone voice plans in the Designated Service Area pursuant to its ETC designation:

- Voice Plan 1 - \$20 per month: includes unlimited local calling, long distance calls within the continental U.S. for \$0.10/minute, and 3 features (900 Call Block, Call Trace, and Dial Block).
- Voice Plan 2 - \$50 per month: includes unlimited local calling and long distance calls within the continental U.S. and 13 features (900 Call Block, Call Trace, Dial Block, Call Waiting, Call Forwarding, 3-Way Calling, Call Return, Anonymous Call Rejection, Caller ID Block, Selective Call Acceptance, Selective Call Rejection, Selective Call Forward, and Speed Dial).
- Individual features such as Caller ID, Voice Mail, Voice Mail to Email, and Voice Mail Prompts in Spanish are \$7 per month.

A Lifeline customer subscribing to Voice Plan 1 above also would be offered toll limitation service at no charge.

The Company plans to offer the following broadband Internet access service plans in the Designated Service Area pursuant to its ETC designation:

- Lite 15 Plus - \$30 per month, 15 Mbps/10 Mbps, 100GB usage
- Starter 100 Plus - \$55 per month, 100 Mbps/10 Mbps, 350 GB usage
- Streamer & Gamer 200 Plus - \$65 per month, 200 Mbps/20 Mbps, 700 GB usage
- Turbo 300 Plus - \$80 per month, 300 Mbps/30 Mbps, 1200 GB usage
- GigaOne Plus - \$125 per month, 1000 Mbps/50 Mbps, 1500 GB usage

To meet its RDOF obligations at the Gigabit level, the Company plans to offer the following broadband Internet access service plan in the RDOF-supported areas of Minnesota in accordance with the service milestones established by the FCC for RDOF support:

- Internet plan offering at least 1 Gbps/500 Mbps with at least 2 TB monthly usage (pricing to be determined, but subject to the FCC's reasonable comparability standards for broadband Internet access services)

The Company plans to offer the following bundled plans in the Designated Service Area pursuant to its ETC designation:

- Starter 100 Plus with voice - \$80.00 per month, 100 Mbps/10 Mbps, 350 GB usage
- Streamer & Gamer Plus with voice - \$90.00 per month, 200 Mbps/20 Mbps, 700 GB usage
- Turbo 300 Plus with voice - \$105.00 per month, 300 Mbps/20 Mbps, 1200 GB usage

The voice plan included in the bundled package is Voice Plan 2 above.

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Pursuant to the FCC's current minimum service standard requirements, the Lifeline discount could be applied to the following broadband Internet access service or bundled service plans:

- Turbo 300 Plus - \$80 per month, 300 Mbps/30 Mbps, 1200 GB usage
- GigaOne Plus - \$125 per month, 1000 Mbps/50 Mbps, 1500 GB usage
- Turbo 300 Plus with voice - \$105.00 per month, 300 Mbps/20 Mbps, 1200 GB usage (Voice Plan 2 above)
- RDOF Internet access service plan

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CERTIFICATE OF SERVICE

I, Angela Collins, hereby certify that I have served a true and correct copy of the foregoing Amended Response of Cable One VoIP LLC d/b/a Sparklight to Notice of Request for Additional Information to all persons on the attached list by electronic service.

Dated this 20th day of April 2021.

/s/ Angela F. Collins

Angela F. Collins

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Caron	Patrick.Caron@cableone.biz	Cable One, Inc.	210 E Earll Dr Phoenix, AZ 85012	Electronic Service	No	OFF_SL_21-161_M-21-161
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_21-161_M-21-161
Angela	Collins	acollins@cahill.com	Ionex Communications North, Inc. dba Birch Communications	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-161_M-21-161
Cherie R.	Kiser	ckiser@cgrdc.com	Cahill Gordon & Reindel LLP	1990 K St NW Ste 950 Washington, DC 20006	Electronic Service	No	OFF_SL_21-161_M-21-161
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-161_M-21-161
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-161_M-21-161