

8300 Greensboro Dr.
Suite 1200
Tysons, VA 22102

(703) 584-8671
WWW.FCCLAW.COM
NOT ADMITTED IN VA

LLGS | LUKAS
LAFURIA
GUTIERREZ
& SACHS LLP

May 2, 2019

VIA ELECTRONIC MAIL (connectamerica@fcc.gov)

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, N.W.
Washington, D.C. 20554

**Re: Certification of OEConnect, LLC Regarding Its ETC Designation Order
from the Federal Communications Commission**

Dear Ms. Dortch:

In compliance with Section 54.314(b)(5) of the Commission's Rules, 47 C.F.R. § 54.315(b)(5), OEConnect, LLC ("OEConnect") hereby provides the attached certification regarding the Commission's Order granting OEConnect Eligible Telecommunications Carrier ("ETC") designation throughout its CAF-II winning areas in New York, effective April 30, 2019 ("ETC Designation Order"), as well as a copy the OEConnect's ETC Designation Order.

If you have any questions regarding any of the information provided, please do not hesitate to contact the undersigned.

Respectfully submitted,



Todd B. Lantor
Counsel to OEConnect, LLC

cc: Stephen Wang, FCC-WCB (via e-mail)

Enclosures

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Petitions for Designation as an Eligible)	
Telecommunications Carrier in the State of New)	
York)	
)	
Telecommunications Carriers Eligible for)	WC Docket No. 09-197
Universal Service Support)	
)	
Connect America Fund)	WC Docket No. 10-90
)	

ORDER

Adopted: April 30, 2019

Released: April 30, 2019

By the Chief, Wireline Competition Bureau:

I. INTRODUCTION

1. In this Order, the Wireline Competition Bureau (Bureau) designates each of four petitioners (identified in the Attachment to this Order) as an eligible telecommunications carrier (ETC) in eligible high-cost areas, conditioned upon and limited to petitioners’ authorization to receive Connect America Phase II support awarded in coordination with New York’s New NY Broadband Program (New York Program).¹ In making these designations, we find that each of these petitioners meets the eligibility requirements set forth in section 214(e)(6) of the Communications Act of 1934, as amended (Act), and related Commission’s rules, to be designated as an ETC in the relevant areas of New York.² The Bureau will release separate public notices regarding Auction 903 funding authorizations.

II. BACKGROUND

A. CAF Support Awarded in Coordination with the New York Program

2. The Connect America Fund (CAF) Phase II auction (Auction 903) is one part of a multi-step process to comprehensively reform and modernize the high-cost component of the Universal Service Fund (USF).³ In 2017, New York sought waiver of certain Auction 903 rules and requirements so that,

¹ See *Wireline Competition Bureau Announces FCC Deadlines for New York Broadband Program Winning Bidders*, WC Docket No. 10-90, Public Notice, 33 FCC Rcd 4922, 4923, App. A (2018) (*New York Long-Form Public Notice*); Phase 3 Awards, <https://nysbroadband.ny.gov/new-ny-broadband-program/phase-3-awards> (announcing carriers selected to receive support pursuant to the New York Program in areas eligible for Connect America Fund support); see also *Connect America Fund*, et al., Order, 32 FCC Rcd 968 (2017) (*New York Auction Waiver Order*).

² 47 U.S.C. § 214(e)(6); 47 CFR § 54.202.

³ *Connect America Fund et al.*, WC Docket Nos. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17725, para. 156 (2011), *aff’d sub nom.*, *In re: FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014).

through its New York Program, it could allocate certain CAF support (that otherwise would have been included in Auction 903) to CAF-eligible areas.⁴ The Commission granted this waiver request conditional upon the participants' compliance with certain terms and conditions consistent with those imposed on Auction 903 winning bidders.⁵ The Commission also emphasized that like all high-cost support recipients, New York Program participants selected to receive CAF support would only be eligible to receive CAF support if designated an ETC in their CAF-eligible areas, and required winning participants to submit proof of such designation within 180 days of the announcement of their support awards.⁶ On May 18, 2018, the Commission released a public notice acknowledging New York's allocation of CAF support to certain participants.⁷

B. Requirements for FCC ETC Designation

3. Section 254(e) of the Act provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support."⁸ Congress gives primary authority for ETC designations to state commissions.⁹ The FCC has authority only when "a common carrier [is] providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State commission."¹⁰ The petitioning carrier must demonstrate that the FCC has jurisdiction and may do so by submitting an "affirmative statement from the state commission or a court of competent jurisdiction that the carrier is not subject to the state commission's jurisdiction."¹¹ To the extent that the petition covers Tribal Lands, and the petitioner has not taken any action at the state-level to initiate ETC proceedings, the petitioner may make an affirmative showing of FCC jurisdiction under relevant law.¹² The Commission has delegated authority to the Bureau to consider appropriate ETC designation requests.¹³

4. A petition for ETC designation by the FCC must include: (1) a certification that the petitioner offers or intends to offer all services designated for support by the Commission pursuant to section 254(c) of the Act; (2) a certification that the petitioner offers or intends to offer the supported services either using its own facilities or a combination of its own facilities and resale of another carrier's services;¹⁴ (3) a description of how the petitioner advertises the availability of the supported services and

⁴ See *New York Auction Waiver Order*, 32 FCC Rcd at 970-71, para. 9. Specifically, New York sought to distribute the \$170.4 million in model-based support previously declined by Verizon in New York. See *id.* at 969, 970-71, paras. 3, 9.

⁵ *Id.* at 990, para. 60. See 47 CFR § 54.315.

⁶ *New York Auction Waiver Order*, 32 FCC Rcd at 990, para. 59.

⁷ *New York Long-Form Public Notice*, 33 FCC Rcd at 4922.

⁸ 47 U.S.C. § 254(e).

⁹ *Id.* § 214(e)(2).

¹⁰ *Id.* § 214(e)(6).

¹¹ See *Federal-State Joint Board on Universal Service et al.*, CC Docket No. 96-45, Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12267, para. 120 (2000) (*2000 Tribal Order*); 47 U.S.C. § 214(e)(6).

¹² *2000 Tribal Order*, 15 FCC Rcd at 12214, 12268-69, paras. 7, 126; see also *id.* at 12218-19, paras. 17-18 (defining Tribal lands to include "reservation" and "near reservation," as those terms are defined under BIA's regulations); 25 CFR § 20.1(r), (v).

¹³ See *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, CC Docket No. 96-45, Public Notice, 12 FCC Rcd 22947, 22948 (1997).

¹⁴ 47 U.S.C. § 214(e)(1); 47 CFR § 54.201(d)(1).

the charges therefor using media of general distribution;¹⁵ (4) a detailed description of the geographic service area for which the petitioner requests to be designated as an ETC;¹⁶ and (5) a certification that neither the petitioner, nor any party to the application, is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.¹⁷

5. In addition, petitioners must demonstrate their ability to meet certain service standards. A petitioner seeking an ETC designation for purposes of becoming eligible to receive high-cost support must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) submit a five-year service plan (applicable only to high cost areas); (3) demonstrate its ability to remain functional in emergency situations; and (4) demonstrate its ability to satisfy applicable consumer protection and service quality standards.¹⁸

6. For petitioners seeking ETC designation for the purpose of becoming authorized to receive Auction 903 support, the Bureau waived the requirements that the petitioners submit a five-year service plan and proof of compliance with consumer protection and service quality standards, finding that the need for such requirements is obviated by specific service quality standards applicable to Auction 903 support recipients and specific reporting obligations relating to such standards.¹⁹ Because the authorization of CAF support for participants in the New York program is conditioned on meeting terms and conditions consistent with those applicable to Auction 903 winning bidders,²⁰ we interpret this waiver as equally applicable to New York Program participants.

7. In addition, prior to designating a carrier as an ETC pursuant to section 214(e)(6) of the Act, the Commission must determine whether such designation is in the public interest.²¹ When making a public interest determination, the Commission historically has considered the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering.²²

C. Petitions for ETC Designation

8. The petitioners that are the subject of this Order seek ETC designation to become eligible to receive CAF support awarded in coordination with the New York Program, as described in the Attachment to this Order. The Bureau released a public notice soliciting comment on each of their

¹⁵ 47 U.S.C. § 214(e)(1); 47 CFR § 54.201(d)(2).

¹⁶ An ETC's "service area" is set by the designating authority and is the geographic area within which an ETC has universal service obligations and may receive universal service support. 47 U.S.C. § 214(e)(5); 47 CFR § 54.207(a). Although section 214(e)(5) of the Act, 47 U.S.C. § 214(e)(5), requires conformance of a competitive ETC's service area and an incumbent rural telephone company's service area, the Commission forbore from imposing such requirements on participants in the New York Program. *New York Auction Waiver Order*, 32 FCC Rcd at 990, para. 59.

¹⁷ 21 U.S.C. § 862; 47 CFR § 1.2002(a)–(b).

¹⁸ See 47 CFR § 54.202(a).

¹⁹ *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197 and 10-90, Public Notice, 33 FCC Rcd 6696, 6699-6700 (WCB 2019).

²⁰ *New York Auction Waiver Order*, 32 FCC Rcd at 990, para. 60.

²¹ 47 U.S.C. § 214(e)(6); 47 CFR § 54.202(b).

²² See, e.g., *Virgin Mobile ETC Designation Order in the States of Alabama, Connecticut, Delaware, New Hampshire and the District of Columbia*, WC Docket 09-197, Order, 25 FCC Rcd 17797, 17799, para. 6 (WCB 2010).

petitions.²³ No third party filed comments in response to any of the petitions that are the subject of this order.

III. DISCUSSION

9. We find that each of these petitioners satisfies the Commission's requirements for ETC designation. We therefore designate the petitioners as high-cost ETCs in New York, conditioned upon and limited to the high-cost areas where they are authorized to receive Connect America Phase II support and effective only upon such authorization. In these areas, petitioners must meet Connect America Phase II requirements, Lifeline requirements, and other service obligations attendant to their high-cost designations, as specified in the Act and the Commission's rules.²⁴

A. Commission Authority

10. Each petitioner demonstrates that the Commission has the requisite authority to designate it as an ETC pursuant to section 214(e)(6) of the Act. The four petitioners separately submitted letters from the New York State Public Service Commission declining ETC designation jurisdiction based on the petitioners' representations that they offered only broadband and Voice over Internet Protocol (VoIP) service.²⁵ We thus find that these petitioners have demonstrated FCC authority to decide these petitions.

B. Eligibility Requirements

11. *Designated Service Area.* Each petitioner describes a designated service area based on all CAF-eligible census blocks covered by its Connect America Phase II award (as listed in Attachment B to this Order).²⁶

12. *Offering the Services Supported by the Universal Service Support Mechanisms.* We find that each of the petitioners establishes through the required certifications and related filings that it will offer the services supported by the federal universal service support mechanisms.²⁷

13. *Compliance with the Service Requirements Applicable to Connect America Phase II Support Awarded through the New York Program.* We find that each of the petitioners establishes its

²³ *Wireline Competition Bureau Seeks Comment on Two Petitions for Designation as Eligible Telecommunications Carriers, Separately Submitted by OEConnect, LLC and Hughes Network Systems, LLC*, Docket No. 09-197, Public Notice, 33 FCC Rcd 6014 (WCB 2018); *Wireline Competition Bureau Seeks Comment on Three Petitions for Designation as an Eligible Telecommunications Carrier in the State of New York, Separately Submitted by DTC Cable, Inc., Heart of the Catskills Communications, Inc. d/b/a MTC Cable, and Mohawk Networks, LLC*, Docket No. 09-197, Public Notice, 33 FCC Rcd 6781 (WCB 2018); *Wireline Competition Bureau Seeks Comment on the Petition for Designation as an Eligible Telecommunications Carrier in the State of New York Submitted by Haeefe TV, Inc.*, Docket No. 09-197, Public Notice, 33 FCC Rcd 8578 (WCB 2018).

²⁴ 47 CFR § 54.202(a)(1)(i); *id.* § 54.101(d); *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3974, 4074-75, paras. 35, 311-12 (2016) (requiring all high-cost recipients to meet Lifeline obligations in all areas where they deploy a network pursuant to a broadband service obligation and are commercially offering qualifying service).

²⁵ DTC Petition at Attach. A; Haeefe Petition at Attach. A; MTC Petition at Attach. A; OEConnect Petition at Ex. B.

²⁶ DTC Petition at Ex. 1; Haeefe Petition at Ex. 1; MTC Petition at Ex. 1; OEConnect Petition at Ex. A; 47 U.S.C. § 214(e); 47 CFR § 54.201(d).

²⁷ DTC Petition at 4-7; Haeefe Petition at 4; MTC Petition at 4-6; OEConnect Petition at 4-8; 47 U.S.C. § 214(e)(1)(A); 47 CFR § 54.201(d)(1).

ability to comply with service requirements applicable to the support that it receives.²⁸ This determination takes into account that the petitioners must demonstrate, as part of their FCC applications, the technical and financial ability to provide voice and broadband services meeting or exceeding Connect America Phase II standards and comply with all relevant public interest obligations.²⁹ Moreover, once authorized, the petitioners must satisfy certain reporting obligations to ensure that the support received is being used efficiently and appropriately and that service requirements are being met.³⁰

14. *Compliance with Service Requirements Applicable to Lifeline Services.* Each petitioner commits to offering Lifeline discounts to qualifying low-income consumers, consistent with the Commission's rules, in all high-cost areas where it is authorized to receive support.³¹

15. *Offering the Supported Services Using a Carrier's Own Facilities.* Each petitioner certifies that it is a facilities-based provider of broadband and voice services.³²

16. *Advertising Supported Services.* Each petitioner commits to advertising the availability of the supported services and related charges using media of general distribution.³³ We emphasize that, as part of this commitment, an ETC must advertise the availability of its services and charges in a manner reasonably designed to reach Lifeline-eligible consumers.³⁴

17. *Ability to Remain Functional in Emergency Situations.* Each petitioner states that it can remain functional in emergency situations. Each petitioner states that it has sufficient back-up power to ensure functionality in the designated service area without an external power source, can re-route traffic around damaged facilities, and can manage traffic spikes resulting from emergency situations.³⁵

18. *Anti-Drug Abuse Act Certification.* Each petitioner submits a certification that satisfies the requirements of the Anti-Drug Abuse Act of 1988, as codified in sections 1.2001-1.2003 of the Commission's rules.³⁶

C. Public Interest Analysis

19. We conclude that the petitioners' participation in universal service programs would be in the public interest and would provide numerous benefits to consumers. Through participation in the New York Program and completion of the Commission's subsequent application process, the petitioners demonstrate that they can offer voice and broadband service in high-cost areas efficiently and at a price and quality comparable to the service offerings in more competitive areas.³⁷ Moreover, granting these petitions will serve the interests of low-income consumers by ensuring the availability of new, facilities-

²⁸ DTC Petition at 4-7; Haefele Petition at 4; MTC Petition at 4-6; OEConnect Petition at 4-8; 47 CFR §§ 54.101(d), 54.202(a)(1)(i).

²⁹ *New York Auction Waiver Order*, 33 FCC Rcd at 991, para. 62.

³⁰ 47 CFR §§ 54.313(a),(e), 54.316(a)(4); *New York Auction Waiver Order*, 33 FCC Rcd at 993, paras. 68-70.

³¹ DTC Petition at 5; Haefele Petition at 3-4; MTC Petition at 5; OEConnect Petition at 5.

³² DTC Petition at 5; Haefele Petition at 4; MTC Petition at 5; OEConnect Petition at 5; 47 U.S.C. § 214(e)(1)(A); 47 CFR § 54.201(d)(1).

³³ DTC Petition at 7; Haefele Petition at 5; MTC Petition at 6; OEConnect Petition at 6; 47 U.S.C. § 214(e)(1)(B); 47 CFR § 54.201(d)(2).

³⁴ 47 CFR § 54.405.

³⁵ DTC Petition at 6-7; Haefele Petition at 5-6; MTC Petition at 7; OEConnect Petition at 7; 47 CFR § 54.202(a)(2).

³⁶ DTC Petition at 8; Haefele Petition at 7, Ex. 2; MTC Petition at 8; OEConnect Petition at 8; 47 CFR § 1.2002.

³⁷ See *New York Auction Waiver Order*, 33 FCC Rcd at 991, paras. 61-62.

based Lifeline services at competitive prices in these areas. Given these commitments and associated representations, granting the ETC designations will help ensure increased consumer choice, affordability, and improved quality of service.

20. Accordingly, based on the information, representations, and certifications in their petitions, we find that the petitioners have met all applicable conditions and prerequisites for ETC designation and that conditionally granting these petitions serves the public interest.

D. Regulatory Oversight

21. Under section 254(e) of the Act, each of these petitioners must use universal service support “only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”³⁸ Under section 214(e), each of the petitioners must provide supported services throughout their service area.³⁹ To help ensure compliance with these requirements, the Commission requires these petitioners to file an annual certification that all federal high-cost support received was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.⁴⁰ The Commission conditions future support awarded through the high-cost program on the filing of such certification.⁴¹ In addition, petitioners must file annual reports detailing their ongoing compliance with service standards, must annually report location deployment data, and must certify by specific deadlines deployment to a specific number of locations.⁴²

22. We find that reliance on petitioners’ commitments to meet these and other regulatory requirements, as well as representations and commitments made in their petitions, is reasonable and consistent with the public interest and the Act. We conclude that fulfillment of these additional reporting requirements will further the Commission’s goal of ensuring that petitioners satisfy their obligation under section 214(e) of the Act to provide supported services throughout their respective designated service areas.

23. The Commission may initiate an inquiry on its own motion to examine any ETC’s records and documentation to ensure that the universal service support the ETC receives is being used “only for the provision, maintenance, and upgrading of facilities and services” in the areas in which it is designated as an ETC.⁴³ Petitioners must provide such records and documentation to the Commission and USAC upon request.⁴⁴ If a petitioner fails to fulfill the requirements of the Act, the Commission’s rules, and the terms of this Order after it begins receiving universal service support, the Commission has authority to revoke the petitioner’s ETC designation.⁴⁵ The Commission also may assess forfeitures for violations of Commission rules and orders.⁴⁶

³⁸ 47 U.S.C. § 254(e).

³⁹ *Id.* § 214(e).

⁴⁰ 47 CFR § 54.314(b).

⁴¹ *Id.*

⁴² *Id.* §§ 54.313(a), (e), 54.316(a)(4); *New York Auction Waiver Order*, 33 FCC Rcd at 993, paras. 68-70.

⁴³ 47 U.S.C. §§ 220, 403.

⁴⁴ 47 CFR § 54.417.

⁴⁵ *Id.* § 54.320(c); *Federal-State Joint Board on Universal Service; Western Wireless Corp. Petition for Preemption of an Order of the South Dakota Public Utilities Commission*, CC Docket No. 96-45, Declaratory Ruling, 15 FCC Rcd 15168, 15174, para. 15 (2000).

⁴⁶ *See* 47 U.S.C. § 503(b).

E. Waiver of Deadline for Submitting Proof of ETC Designation

24. The Commission required participants in the New York Program to submit the requisite proof of ETC designation to the Commission no later than November 14, 2018.⁴⁷ The Bureau finds, on its own motion, good cause to waive this deadline for the petitioners that are the subject of this Order.⁴⁸ The Commission has routinely waived similar deadlines when the ETC designation proceeding is not yet complete despite the good faith efforts of the petitioner.⁴⁹ These petitioners filed their petitions for ETC designation well in advance of the November deadline, and none of the petitions raise unique factual or legal concerns nor were they challenged. Accordingly, because the delay in issuing this Order is unrelated to the filing date of these petitions, waiver of the deadline is appropriate.

IV. ORDERING CLAUSES

25. Accordingly, IT IS ORDERED, pursuant to the authority contained in section 214(e)(6) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(e)(6), and the authority delegated in sections 0.91 and 0.291 of the Commission's rules, 47 CFR §§ 0.91, 0.291, that EACH OF THE PETITIONERS SPECIFIED IN THE ATTACHMENT TO THIS ORDER ARE CONDITIONALLY DESIGNATED AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE CENSUS BLOCKS SPECIFIED IN ATTACHMENT B. These designations are contingent upon the petitioners becoming authorized to receive such support, is limited to those areas where support is authorized and is effective only upon authorization.

26. IT IS FURTHER ORDERED that pursuant to section 1.3 of the Commission's rules, 47 CFR § 1.3, and pursuant to the authority delegated under sections 0.91, and 0.291 of the Commission's rules, 47 CFR §§ 0.91, 0.291, the deadline specified in the *New York Auction Waiver Order* for submitting proof of ETC designation IS WAIVED to the extent described above.

⁴⁷ *New York Long-Form Public Notice*, 33 FCC Rcd at 4922.

⁴⁸ 47 CFR §§ 0.91(p) (functions of the Wireline Competition Bureau), 0.291 (delegation of authority to the Wireline Competition Bureau). The Commission may waive its policies or rules upon a showing of good cause and may take into account, on an individual basis, considerations of hardship, equity, or more effective implementation of overall policy. See *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); see also *NE Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990). Waiver of the Commission's policies or rules is appropriate only if both: (i) special circumstances warrant a deviation from the general rule; and (ii) such deviation will serve the public interest. See *Network IP, LLC v. FCC*, 548 F.3d 116, 127 (D.C. Cir. 2008). Deadlines can only be waived under "unusual or compelling circumstances." *Id.* at 126 (citation omitted).

⁴⁹ See, e.g., *Connect America Fund et al., Report and Order and Further Notice of Proposed Rulemaking*, 31 FCC Rcd 5949, 6002, para. 152 (2016); *Wireline Competition Bureau Announces Rural Broadband Experiment Support for 13 Provisionally Selected Bids is Ready to be Authorized*, Public Notice, 30 FCC Rcd 9978, 9980-81 (WCB 2015).

27. IT IS FURTHER ORDERED that a copy of this order SHALL BE transmitted by the Office of the Secretary to the New York Public Utilities Commission and to the Universal Service Administrative Company; and

28. IT IS FURTHER ORDERED that, pursuant to section 1.102(b)(1) of the Commission's rules, 47 CFR § 1.102(b)(1), this order SHALL BE effective upon release.

FEDERAL COMMUNICATIONS COMMISSION

Kris Anne Monteith
Chief
Wireline Competition Bureau

ATTACHMENT A

Petitioner	Date Petition Filed	Census Blocks Covered by Selected Bid	Locations Covered by Selected Bid	Total Estimated CAF Award
DTC Cable Inc. (DTC) ⁵⁰	7/2/2018	118	712	\$2,103,935
Haefele TV Inc. (Haefele) ⁵¹	8/17/2018	97	667	\$1,257,581
MTC Cable (MTC) ⁵²	6/29/2018	177	1,659	\$4,276,982
OEConnect, LLC (OEConnect) ⁵³	5/9/2018	282	1,146	\$4,298,623

⁵⁰ DTC Cable, Inc., Petition for Eligible Telecommunications Carrier Designation, WC Docket No. 09-197 (filed July 2, 2018), <https://www.fcc.gov/ecfs/filing/10702031317423>, *errata*, <https://www.fcc.gov/ecfs/filing/1071141030872> (filed July 11, 2018), *errata*, <https://www.fcc.gov/ecfs/filing/10711218101092> (filed July 11, 2018) (DTC Petition).

⁵¹ Petition for Eligible Telecommunications Designation, WC Docket No. 09-197 (filed Aug. 17, 2018) (Haefele Petition).

⁵² Heart of the Catskills Communications, Inc. d/b/a MTC Cable, Petition for Eligible Telecommunications Carrier Designation, WC Docket No. 09-197 (filed June 29, 2018), <https://www.fcc.gov/ecfs/filing/10629141204899> (MTC Petition).

⁵³ OEConnect requests designation as an ETC in all areas where its parent company, Otsego Electric Cooperative, has been awarded CAF support pursuant to the New York Program. OEConnect, LLC, Petition for Eligible Telecommunications Carrier Status, WC Docket No. 09-197, 1 (filed May 9, 2018), <https://www.fcc.gov/ecfs/filing/1050920563131>, *amended*, <https://www.fcc.gov/ecfs/filing/1060835101842> (filed June 8, 2018) (OEConnect Petition).

ATTACHMENT B

Census Blocks Covered by Selected Bid

DTC Cable, Inc.

360179709001091	360259701003092	360259703002011	360775907002128
360259701001000	360259701003104	360259703003080	360775907002133
360259701001005	360259701003105	360259703003107	360775907002136
360259701001007	360259701003107	360259703003114	360775907002137
360259701001008	360259701003109	360259703003135	360775907002138
360259701001009	360259701003110	360259704001090	360775907002141
360259701001013	360259701003112	360259705001064	360775907002143
360259701001014	360259701003115	360259705001083	360775907002144
360259701001015	360259701003116	360259705002032	360775907002151
360259701001016	360259701003121	360259705002034	360775907002152
360259701001017	360259701003125	360259705003007	360775907002154
360259701001019	360259701003126	360259710001038	360775907002155
360259701001023	360259701004051	360259710001042	360775907002156
360259701001025	360259701004057	360259710001043	360775907002162
360259701001026	360259702001012	360259710001061	360775907002163
360259701001027	360259702001051	360259710001087	360775907002169
360259701001034	360259702002001	360259710001093	360775907002170
360259701001036	360259702002005	360259710001095	360775907003112
360259701001037	360259702002006	360259710003067	360775907003124
360259701001040	360259702002011	360259710003076	360775907003127
360259701001045	360259702002012	360259710003077	360775907003134
360259701001074	360259702002013	360259710003078	360775907003147
360259701001075	360259702002014	360259710003079	360775907003164
360259701001078	360259702003053	360775907002105	360775907003165
360259701001086	360259702004009	360775907002106	360775907003166
360259701002002	360259703002006	360775907002109	360775907003172
360259701002008	360259703002007	360775907002123	360775908005039
360259701003000	360259703002008	360775907002124	360775914001081
360259701003012	360259703002009	360775907002125	
360259701003088	360259703002010	360775907002126	

Haefele TV, Inc.

360150101003001	360979503002017	361070206001027	361070207021086
360150101003002	360979503002026	361070206003014	361070207021088
360150101003030	360979503002029	361070206003017	361070207021141
360150110003015	360979503002039	361070206004003	361070207022000
360150110003016	361019613002053	361070206004004	361070207022001
360150110003017	361019615002034	361070206004005	361070207022002
360150110003018	361019615002042	361070206004006	361070207022004
360150110003019	361019615002043	361070206004007	361070207022006
360150110003023	361019615002045	361070206004008	361070207022007
360150110003024	361019615002046	361070206004009	361070207022009
360150110003025	361019615002047	361070206004010	361070207022010
360150110003040	361019615002058	361070206004014	361070207022011
360150110003041	361019615002060	361070206004016	361070207022013
360150110003053	361019615002061	361070206004017	361070207022021
360150110003054	361019615002075	361070206004018	361070207022030
360150110003075	361019615002083	361070206004021	361070207022049
360150110003076	361019615002085	361070206004032	361070207022079
360150110003077	361019615002089	361070206004033	361070207023026
360150110003078	361019615002092	361070206004064	361070207023036
360150110003079	361019615002093	361070207021064	361070207023037
360239712004023	361019615002095	361070207021069	361090018001071
360979502001032	361019615002097	361070207021078	361090018003056
360979502001050	361019615002101	361070207021080	
360979502001052	361070206001007	361070207021082	
360979503002010	361070206001008	361070207021083	

Heart of the Catskills Communications, Inc. d/b/a MTC Cable

360259701002000	360390804021001	360390804021131	360957408003175
360259701002001	360390804021002	360390804021134	360957408003181
360259701002007	360390804021006	360390804021135	360957408004000
360259701002009	360390804021008	360390804021139	360957408004001
360259701002010	360390804021009	360390804022028	360957408004004
360259701002016	360390804021011	360390804022030	360957408004005
360259701002017	360390804021013	360390804022031	360957408004008
360259701002018	360390804021014	360390804022072	360957408004009
360259701002028	360390804021015	360390804022077	360957408004010
360259701002033	360390804021017	360390804022078	360957408004011
360259701002034	360390804021019	360390804022079	360957408004017
360259701002049	360390804021025	360390804022096	360957408004018
360259701002051	360390804021026	360957406002135	360957408004019
360259701004058	360390804021033	360957406003020	360957408004020
360259706004038	360390804021035	360957406003030	360957408004024
360259706004076	360390804021037	360957406004069	360957408004025
360259710001046	360390804021038	360957408001056	360957408004034
360259710001059	360390804021041	360957408001068	360957408004035
360259710003049	360390804021043	360957408001102	360957408004036
360259710003062	360390804021047	360957408002002	360957408004041
360259710003063	360390804021048	360957408002005	360957408004042
360259710003064	360390804021049	360957408002006	360957408004046
360259710003065	360390804021053	360957408002007	360957408004050
360259710003071	360390804021058	360957408002012	360957408004051
360259710003072	360390804021060	360957408002013	360957408004054
360259710003074	360390804021063	360957408002014	360957408004055
360259710003075	360390804021066	360957408002023	360957408004056
360259711001000	360390804021067	360957408002024	361059502001014
360259711001017	360390804021068	360957408002025	361059502001015
360259711001019	360390804021069	360957408002026	361059502001027
360259711001020	360390804021070	360957408002027	361119509001014
360259711001030	360390804021072	360957408002029	361119509001022
360259711001035	360390804021075	360957408002030	361119509001025
360259711001037	360390804021076	360957408002032	361119509001026
360259711001040	360390804021077	360957408002036	361119509001029
360259711001041	360390804021082	360957408002039	361119509001030
360259711001043	360390804021083	360957408002041	361119509001031
360259711001049	360390804021085	360957408002042	361119509001039
360259711001060	360390804021090	360957408002049	361119509001040
360259711003018	360390804021092	360957408002060	361119509001132
360259711003022	360390804021104	360957408002063	361119509002058
360259713001068	360390804021121	360957408002064	361119509002080
360259713001070	360390804021122	360957408002065	
360259713001072	360390804021127	360957408002080	
360259713001201	360390804021128	360957408002081	

OEConnect, LLC

360775901002044	360775904001057	360775904005096	360775906002044
360775901004009	360775904001059	360775904005097	360775906002047
360775901004039	360775904001063	360775904005101	360775906002048
360775901004074	360775904001065	360775904005102	360775906002049
360775902011018	360775904001067	360775904005103	360775906002050
360775902011020	360775904001116	360775904005105	360775906002052
360775902011021	360775904001118	360775904005106	360775906002053
360775902011039	360775904001119	360775904005108	360775906002054
360775902011040	360775904001123	360775904005111	360775906002055
360775902011060	360775904002021	360775904005112	360775906002056
360775902012008	360775904002022	360775904005113	360775906002057
360775902012009	360775904002029	360775904005115	360775906002059
360775902012011	360775904002046	360775904005118	360775906002062
360775902012012	360775904002052	360775904005121	360775906002064
360775902012021	360775904002053	360775904005122	360775906002065
360775902012022	360775904002055	360775904005123	360775906002066
360775902012023	360775904003018	360775904005124	360775906002091
360775902012024	360775904003022	360775904005125	360775906002098
360775902012026	360775904003023	360775904005126	360775906002101
360775902012030	360775904003040	360775904005127	360775906002102
360775902012031	360775904004000	360775904005128	360775906002106
360775902012032	360775904004001	360775904005130	360775906002107
360775902012043	360775904004002	360775904005139	360775906002110
360775902012044	360775904004020	360775904005146	360775906002114
360775902012064	360775904004022	360775904005192	360775906002115
360775902012069	360775904004104	360775905002009	360775914001009
360775902012070	360775904005004	360775905003000	360775914001013
360775902012071	360775904005019	360775905003002	360775914001035
360775902012073	360775904005031	360775905003003	360775914005002
360775902012074	360775904005032	360775905003004	360775914005006
360775902012087	360775904005050	360775905003006	360775914005013
360775902012091	360775904005051	360775905003007	360775914005016
360775902023063	360775904005052	360775905003020	360775914005019
360775902023064	360775904005054	360775905003021	360775914005020
360775902023074	360775904005058	360775905003025	360775914005028
360775902023076	360775904005059	360775905003036	360775914005117
360775902023089	360775904005060	360775905003039	360775915004047
360775902023091	360775904005062	360775905003043	360430101001000
360775902023093	360775904005070	360775906002014	360430101001002
360775902023094	360775904005071	360775906002024	360430101001005
360775902023095	360775904005073	360775906002025	360430101001006
360775902023096	360775904005075	360775906002027	360430101001007
360775902023097	360775904005076	360775906002029	360430101001010
360775903004085	360775904005077	360775906002032	360430101001033
360775904001000	360775904005079	360775906002036	360430101001034
360775904001001	360775904005081	360775906002040	360430101001036
360775904001050	360775904005083	360775906002041	360430101001052
360775904001055	360775904005086	360775906002043	360430101001055

360430101001056	360775903001052
360430101001063	360775903001053
360430101001065	360775903001055
360430101001066	360775903001061
360430101001068	360775903001094
360430101001070	360775903001096
360430101001076	360775903003051
360430101001079	360775903003054
360430101002042	360775903004004
360430101002045	360775903004006
360430101002046	360775903004010
360430101002048	360775903004019
360430101002050	360775903004026
360775901001047	360775903004029
360775901001062	360775903004030
360775901001133	360775903004031
360775901001134	360775903004032
360775901001142	360775903004035
360775901002000	360775903004036
360775901002001	360775903004037
360775901002002	360775903004038
360775901002005	360775903004039
360775901002022	360775903004045
360775901002024	360775903004047
360775901002037	360775903004093
360775901003160	360775904002001
360775902021011	360775904002002
360775902021016	360775904002003
360775902021017	360775904002017
360775902021083	360775904003001
360775902021084	360775906001064
360775902023003	360775906001065
360775902023012	360775903004079
360775902023016	360775903004080
360775902023019	360775904001002
360775902023021	360775904001003
360775902023022	360775904001004
360775902023023	360775904002015
360775902023028	360775904002019
360775902023032	
360775902023034	
360775903001004	
360775903001017	
360775903001018	
360775903001020	
360775903001022	
360775903001026	
360775903001038	
360775903001048	
360775903001049	
360775903001050	