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October 7, 2020

Ms. Jocelyn Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia SC 29210

**Re: Application of Palmetto Telephone Communications, LLC to Expand Designation as an Eligible Telecommunications Carrier (Lifeline Only) to Include St. George Exchange (Docket No. 2020-208-C)**

Dear Ms. Boyd:

Enclosed for filing on behalf of Palmetto Telephone Communications, LLC, please find the Verified Direct Testimony of Jason J. Dandridge in the above-referenced proceeding.

Thank you for your assistance.

Very truly yours,

Burr & Forman LLP



Margaret M. Fox

Attachments

cc: C. Lessie Hammonds, Esq.

BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Application of Palmetto Telephone )  
Communications, LLC to Expand Designation )  
as an Eligible Telecommunications Carrier ) Docket No. 2020-208-C  
(Lifeline Only) to Include St. George Exchange )  
\_\_\_\_\_ )

**TESTIMONY OF JASON J. DANDRIDGE**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 **A.** My name is Jason J. Dandridge. My business address is 2471 Jefferies Highway, Walterboro,  
3 South Carolina.

4 **Q. BY WHOM AND IN WHAT CAPACITY ARE YOU EMPLOYED?**

5 **A.** I am Chief Executive Officer of Palmetto Rural Telephone Cooperative, Inc., and Palmetto  
6 Telephone Communications, LLC.

7 **PLEASE BRIEFLY OUTLINE YOUR EDUCATION, TRAINING, AND**  
8 **EXPERIENCE IN THE TELEPHONE INDUSTRY.**

9 **A.** I have 22 years of telecommunications experience with Palmetto Rural Telephone  
10 Cooperative, Inc., the parent company of Palmetto Telephone Communications, LLC. I  
11 started with the cooperative as Staff Engineer and was later promoted to Assistant General  
12 Manager. In my current role as Chief Executive Officer, I am responsible for ensuring the  
13 long term business and financial viability of the company; managing the activities of the  
14 company directly and through other key personnel; interpreting and implementing policies;

1 evaluating new business opportunities and making recommendations to the Board of  
2 Directors; ensuring all operations comply with applicable federal, state, and local regulations;  
3 and ensuring the success of the company within the guidelines and authority established by  
4 the Board of Directors. I graduated from Clemson University in 1994 with a Bachelor of  
5 Science degree in Civil Engineering, and earned an MBA from The Citadel in 2001.

6 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING HERE TODAY AND WHAT IS THE**  
7 **PURPOSE OF YOUR TESTIMONY?**

8 **A.** I am testifying on behalf of Palmetto Telephone Communications, LLC (“Palmetto” or the  
9 “Applicant”). By its Application, Palmetto requests that the Public Service Commission of  
10 South Carolina (“Commission”) expand its designation as an Eligible Telecommunications  
11 Carrier (“ETC”) to include the St. George exchange (the “Designated Service Area”).  
12 Palmetto is seeking only low income (Lifeline) support, and is not requesting high cost  
13 support. Palmetto previously was designated as an ETC within the Walterboro and Yemassee  
14 exchanges for these purposes. *See* Order No. 2012-739. The purpose of my testimony is to  
15 demonstrate that Palmetto meets all of the statutory and regulatory prerequisites for  
16 designation as an ETC in the Designated Service Area, and that designation of Palmetto as an  
17 ETC in the Designated Service Area will serve the public interest.

18 **Q. PLEASE GIVE A BRIEF OVERVIEW OF PALMETTO TELEPHONE**  
19 **COMMUNICATIONS.**

20 **A.** Palmetto was organized as a Limited Liability Corporation in the State of South Carolina in 1998.  
21 Palmetto is a wholly owned subsidiary of Palmetto Rural Telephone Cooperative, Inc., which has  
22 been providing local exchange telephone service in the State of South Carolina since 1955. In

1 1999, the Commission granted Applicant a certificate to provide resold interexchange  
2 telecommunications services within the State of South Carolina. *See* Commission Order No.  
3 1999-617 in Docket No. 1999-309-C. In 2004, the Commission granted Applicant a certificate to  
4 provide competitive local exchange and exchange access service to customers located in the  
5 Walterboro exchange served by Frontier Communications of the Carolinas, Inc., formerly  
6 Verizon South, Incorporated (“Frontier”). *See* Commission Order No. 2004-1 in Docket No.  
7 2003-270-C. In 2011, the Commission granted Applicant’s request to expand its certificate to  
8 include authority to provide service to the Yemassee, Ehrhardt, Olar, and Fairfax exchanges  
9 served by Frontier, and the Hampton and Estill exchanges served by United Telephone Company  
10 of the Carolinas, Inc., d/b/a CenturyLink (“CenturyLink”). *See* Commission Order No. 2012-75  
11 in Docket No. 2011-303-C. In 2014, the Commission further expanded Palmetto’s authority to  
12 include all areas of the State except those where the incumbent local exchange carrier holds a  
13 federal rural telephone company exemption. *See* Order On 2014-802 in Docket No. 2014-324-C.

14 **Q. UNDER WHAT AUTHORITY IS PALMETTO TELEPHONE COMMUNICATIONS**  
15 **SEEKING DESIGNATION AS AN ETC?**

16 **A.** Section 214(e)(2) of the Federal Telecommunications Act of 1996 gives States the primary  
17 responsibility for granting ETC status. This section of the Act provides further: “Upon  
18 request and consistent with the public interest, convenience, and necessity, the State  
19 commission ... shall, [in the case of areas not served by a rural telephone company], designate  
20 more than one common carrier as an eligible telecommunications carrier for a service area  
21 designated by the State commission, so long as each additional requesting carrier meets the  
22 requirements [set forth in Section 214(e)(1) for the ETC designated area].”

1 **Q. IS THE ST. GEORGE EXCHANGE SERVED BY A RURAL TELEPHONE**  
2 **COMPANY?**

3 **A.** No. The ILEC that serves the St. George exchange is BellSouth Telecommunications, LLC  
4 d/b/a AT&T South Carolina (“AT&T”). AT&T is not a rural telephone company as defined  
5 in the Act and, therefore, the St. George exchange is not an area served by a rural telephone  
6 company. The St. George exchange comprises the AT&T wire center STGRSCMARS1. A  
7 map of the St. George exchange is attached to my testimony as Exhibit 1.

8 **Q. WILL GRANTING PALMETTO TELEPHONE COMMUNICATIONS’ REQUEST**  
9 **SERVE THE PUBLIC INTEREST?**

10 **A.** Yes. PTC’s request for designation as an ETC in the St. George exchange is in the public  
11 interest. Palmetto seeks designation only for purposes of receiving federal universal service  
12 support for providing competitive Lifeline service to low-income customers in its service  
13 territory. Palmetto is currently operating as a competitive local exchange carrier (“CLEC”) in  
14 the St. George exchange. Granting Palmetto’s request for ETC designation will allow  
15 Palmetto to provide Lifeline discounts to those qualifying low-income customers in the St.  
16 George exchange who desire to receive their local exchange service from Palmetto.

17 **Q. WHAT OTHER REQUIREMENTS DOES SECTION 214(e) IMPOSE ON ETCs?**

18 **A.** Section 214(e)(1) of the Act requires that a carrier designated as an ETC must, throughout the  
19 Designated Service Area:

20 (A) offer the services that are supported by Federal universal service support  
21 mechanisms under section 254(c), either using its own facilities or a  
22 combination of its own facilities and resale of another carrier’s services

1 (including the services offered by another eligible telecommunications  
2 carrier); and

3 (B) advertise the availability of such services and the charges therefor using  
4 media of general distribution.

5 **Q. DOES PALMETTO MEET THESE REQUIREMENTS?**

6 **A.** Yes, it does. Palmetto is a common carrier as defined in Section 153(10) of the Act.  
7 Palmetto has previously been granted authority by the Commission to provide competitive  
8 local exchange telecommunications service in the St. George exchange.

9  
10 Section 214(e)(1)(A) of the Act provides that carriers designated as ETCs shall, throughout  
11 the designated service area, offer the services that are supported by federal universal service  
12 support mechanisms. The services designated for support by the Federal Communications  
13 Commission (“FCC”) are voice telephony services and broadband services.<sup>1</sup> Eligible voice  
14 telephony and broadband services are defined as follows:

15 Eligible voice telephony services must provide voice grade access to  
16 the public switched network or its functional equivalent; minutes of  
17 use for local service provided at no additional charge to end users;  
18 access to the emergency services provided by local government or  
19 other public safety organizations, such as 911 and enhanced 911, to  
20 the extent the local government in an eligible carrier’s service area  
21 has implemented 911 or enhanced 911 systems; and toll limitation  
22 services to qualifying low-income consumers as provided in subpart E  
23 of this part.<sup>2</sup>

24  
25 Eligible broadband Internet access services must provide the  
26 capability to transport data to and receive data by wire or radio from  
27 all or substantially all Internet endpoints, including any capabilities

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1 47 C.F.R. § 54.101(a).

2 47 C.F.R. § 54.101(a)(1).

1 that are incidental to and enable the operation of the communications  
2 service, but excluding dial-up service.<sup>3</sup>  
3  
4

5 Palmetto will offer the services that are supported by Federal universal service support  
6 mechanisms under Section 254(c) of the Act, using either its own facilities or a combination  
7 of its own facilities and resale of another carrier's services. Thus, Palmetto meets the  
8 requirement set forth in Section 214(e)(1)(A).  
9

10 Specifically, Palmetto will provide voice telephony services as described above, including  
11 voice grade access to the public switched network; unlimited local usage at no additional  
12 charge to end users; access to 911; and toll limitation service for qualifying low-income  
13 customers. Palmetto will also provide broadband Internet access, *i.e.*, the capability to  
14 transport data to and receive data by wire or radio from all or substantially all Internet  
15 endpoints, including any capabilities that are incidental to and enable the operation of the  
16 communications service, but excluding dial-up service.<sup>4</sup>  
17

18 Upon designation as an ETC, Palmetto will participate in, and offer, Lifeline service to  
19 qualifying low-income consumers and will publicize the availability of Lifeline service in a  
20 manner reasonably designed to reach those likely to qualify for those services, as required by

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<sup>3</sup> 47 C.F.R. § 54.101(a)(2).

<sup>4</sup> While the Commission does not regulate the provision of broadband service [*see* S.C. Code Ann. §58-9-280(G)], the Commission has the authority to designate Palmetto as an ETC for purposes of receiving federal funding, including the authority to find that Palmetto provides the supported services, which include broadband service.

1 FCC Rules.<sup>5</sup> Palmetto will advertise the availability of and charges for Lifeline service in the  
 2 Designated Service Area using media of general distribution, as required by FCC Rules.

3 **Q. DOES PALMETTO MEET THE ADDITIONAL REQUIREMENTS ADOPTED BY**  
 4 **THE COMMISSION FOR DESIGNATION AS AN ETC?**

5 **A.** Yes. The Commission has adopted additional requirements for an ETC applicant to  
 6 demonstrate its capability and commitment to offer the supported services.<sup>6</sup> These regulations  
 7 are similar to ones adopted by the FCC for ETC applicants.<sup>7</sup> Palmetto satisfies all of these  
 8 requirements, as detailed below.

9  
 10 Commitment to Provide Service to All Customers Making Reasonable Request for Service.

11 The Commission's regulations require an ETC applicant to commit to providing service  
 12 throughout the applicant's proposed designated service area to all customers making a  
 13 reasonable request for service by certifying that it will "provide service on a timely basis to  
 14 requesting customers within the applicant's service area where the applicant's network already  
 15 passes the potential customer's premises in areas."<sup>8</sup> If the potential customer is within the  
 16 applicant's licensed service area but outside its existing network coverage, the applicant must  
 17 certify that service will be provided within a reasonable period of time if service can be  
 18 provided at reasonable cost by:

19 (a) modifying or replacing the requesting customer's equipment; (b) deploying

5 *See* 47 C.F.R. §§ 54.401-54.410; 54.405(b).

6 *See* Commission Regulation 103-690(C)(a).

7 *See* 47 C.F.R. § 54.202(a).

8 R. 103-690(C)(a)(1)(A)(1).

1 a roof-mounted antenna or other equipment; (c) adjusting the nearest cell  
2 tower; (d) adjusting network or customer facilities; (e) reselling services from  
3 another carrier's facilities to provide service; or (f) employing, leasing or  
4 constructing an additional cell site, cell extender, repeater, or other similar  
5 equipment.<sup>9</sup>

6 Palmetto commits to offer its services to customers making reasonable requests for such in  
7 accordance with the process set forth in Commission regulations.

8  
9 Two-Year Advertising and Outreach Plan. For carriers like Palmetto who are not seeking  
10 High Cost Support from the USF, but are seeking ETC designation for the purpose of  
11 participation in the Lifeline program, the Commission does not require a two-year network  
12 improvement plan to be filed.<sup>10</sup> Instead, the Commission requires the Applicant to submit a  
13 two-year plan that describes the carrier's plans for advertising and outreach programs for  
14 identifying, qualifying, and enrolling eligible participants in the Lifeline program.<sup>11</sup>  
15 Palmetto's "Advertising and Outreach Plan for Lifeline Service" is attached to Palmetto's  
16 Application as **Exhibit 2**.

17  
18 Functionality in Emergencies. The Commission's regulations require that an ETC applicant

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<sup>9</sup> R. 103-690(C)(a)(1)(A)(2). This process is identical to the process set forth by the FCC in its rules. *See* 47 C.F.R. § 202(a)(1)(i)(B).

<sup>10</sup> R. 103-690(C)(a)(1)(C).

<sup>11</sup> *Id.* The Commission's rule also references the Link Up program. The FCC eliminated support for Link Up services on non-Tribal lands for all ETCs, effective April 2, 2012. *See* Report and Order and Further Notice of Proposed Rulemaking, *In the Matter of Lifeline and Link Up Reform and Modernization*, FCC 12-11, WC Docket No. 11-42, (rel. February 6, 2012) ("*Lifeline Reform Order*").

1 demonstrate its ability to remain functional in emergency situations, including a  
 2 demonstration that it has a “reasonable amount of back-up power to ensure functionality  
 3 without an external power source, its ability to reroute traffic around damaged facilities, and  
 4 its capability of managing traffic spikes resulting from emergency situations.”<sup>12</sup> Palmetto  
 5 meets this requirement.

6  
 7 Satisfaction of Consumer Protection and Service Quality Standards. The Commission  
 8 requires that an ETC applicant demonstrate that it will satisfy applicable consumer protection  
 9 and quality standards.<sup>13</sup> As a telephone utility regulated by the Commission, Palmetto is  
 10 subject to and complies with all Commission regulations governing consumer protection and  
 11 service quality standards.<sup>14</sup>

12  
 13 Offers Local Usage Plans Comparable to ILECs. The Commission requires that an ETC  
 14 applicant demonstrate that it offers a local usage plan comparable to the one offered by the  
 15 ILEC in the service areas for which it seeks designation.<sup>15</sup> As demonstrated in its local tariff  
 16 on file with the Commission, Palmetto meets this requirement.

17  
 18 Certifications by Affidavit. Under the Commission’s requirements, ETC applicants must  
 19 certify by affidavit signed by an officer of the company that:

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12 R. 103-690(C)(a)(2).

13 R. 103-690(C)(a)(3).

14 *See generally* R. 103-600 *et seq.*

15 R. 103-690(C)(a)(4).

1 (a) the carrier acknowledges that the Federal Communications Commission may  
2 require it to provide equal access to long distance carriers in the event that no  
3 other eligible telecommunications carrier is providing equal access within the  
4 service area;<sup>16</sup>

5 (b) that the company offers or will offer the supported services by using its own  
6 facilities or a combination of its own facilities and resale of another carrier's  
7 services;<sup>17</sup> and

8 (c) that the company does or will advertise in a media of general distribution the  
9 availability of such services, including lifeline services and the applicable  
10 charges.<sup>18</sup>

11 My certification that Palmetto meets or will meet each of these requirements is attached to  
12 Palmetto's Application as **Exhibit 3** and is incorporated by reference herein.

13 **Q. WHAT OTHER INFORMATION CAN YOU SHARE TO DEMONSTRATE THAT**  
14 **GRANTING PALMETTO'S REQUEST FOR DESIGNATION AS AN ETC IS IN THE**  
15 **PUBLIC INTEREST?**

16 **A.** Designation of Palmetto as an ETC for purposes of providing Lifeline service to low-income  
17 customers in its Designated Service Area is in the public interest. Palmetto has requested  
18 designation and has limited its request for federal universal service support to the federal USF  
19 low-income support (Lifeline) program. Palmetto certifies that all low-income USF support it  
20 receives will be used to provide a credit to its Lifeline eligible customers, consistent with 47

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<sup>16</sup> R. 103-690(C)(a)(5).

<sup>17</sup> R. 103-690(C)(a)(6).

1 C.F.R. § 54.403. Palmetto agrees to include in its quarterly Service Quality Report the  
2 number and justification of applications held for more than 30 days and the number and  
3 justification of applications that were denied. Palmetto will seek direct low-income support  
4 from the federal USF only for those lines provided through the use of its own facilities or  
5 through a combination of its own facilities and the leased facilities of another carrier.

6  
7 Palmetto also agrees to report quarterly the percentage of consumers offered Lifeline through  
8 resale of another carrier's service. Palmetto will utilize the same qualifying criteria for  
9 Lifeline as are used by the incumbent carriers serving those areas.<sup>19</sup> Palmetto will abide by  
10 all advertising, reporting, and verification requirements established by the FCC and the  
11 Commission.

12  
13 Additionally, Palmetto agrees to provide voice telephony Lifeline customers an additional  
14 \$3.50 state Lifeline credit.<sup>20</sup> Should Palmetto seek designation as an ETC for purposes of  
15 receiving high cost support, it will file an additional and separate application with the  
16 Commission that addresses all applicable state and federal laws, rules and regulations,  
17 including, but not limited to, an appropriate build-out plan. Upon designation, Palmetto will

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18 R. 103-690(C)(a)(7).

19 *See* Report and Order and Further Notice of Proposed Rulemaking, *In the Matter of Lifeline and Link Up Reform and Modernization*, FCC 12-11, WC Docket No. 11-42, (rel. February 6, 2012) ("*Lifeline Reform Order*").

20 The additional state discount will be applied to those customer accounts that receive the federal discount applicable to voice customers as described in 47 C.F.R. §54.403 for as long as such customers qualify for a federal Lifeline discount. While Palmetto does not intend to seek funding from the State USF at this time, Palmetto reserves the right to seek funding from the State USF for the state-matching portion of the Lifeline discount should it be appropriate to do so.

1 make any changes to its tariff to reflect the provision of Lifeline service as may be necessary  
2 or appropriate.

3 **Q. WHAT WOULD YOU HAVE THE COMMISSION DO IN REGARD TO THIS**  
4 **APPLICATION?**

5 **A.** Palmetto Telephone Communications, LLC, respectfully requests that the Commission find  
6 that Palmetto meets all of the statutory and regulatory prerequisites for designation as an ETC  
7 in the Designated Service Area; and that designation of Palmetto as an ETC will serve the  
8 public interest. Palmetto asks that the Commission, therefore, grant its Application for  
9 expansion of its designation as an ETC to include the St. George exchange for the purpose of  
10 receiving federal universal service support for the provision of Lifeline service to qualifying  
11 low-income customers.

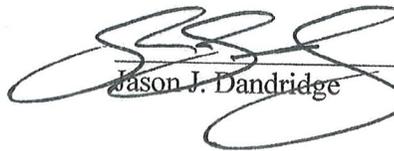
12 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

13 **A.** Yes, it does.



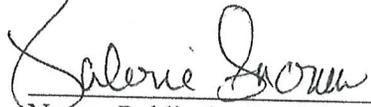
VERIFICATION

I, Jason J. Dandridge, first being duly sworn, depose and say that I am Chief Executive Officer of Palmetto Telephone Communications, LLC; that I have read the foregoing pre-filed testimony and know the contents thereof; and that said contents are true.

  
Jason J. Dandridge

SWORN to before me this

7<sup>th</sup> day of October, 2020.

, L.S.

Notary Public for South Carolina

My Commission expires: 7-15-2029

