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January 6, 2021

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 for Designation as an Eligible Telecommunications Carrier in Certain Census Blocks in Charleston County for Purposes of Receiving Federal Rural Digital Opportunity Fund ("RDOF") Phase I Support

Dear Ms. Boyd:

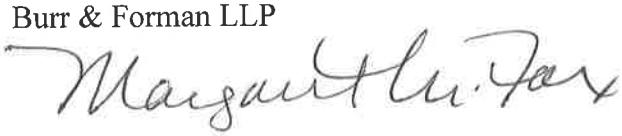
Please find enclosed for filing on behalf of Palmetto Telephone Communications, LLC ("PTC"), an Application for Designation as an Eligible Telecommunications Carrier in Certain Census Blocks in Charleston County for Purposes of Receiving Federal Rural Digital Opportunity Fund ("RDOF") Phase I Support.

A proposed Notice of Filing is also enclosed for your consideration.

Thank you for your assistance.

Sincerely,

Burr & Forman LLP



Margaret M. Fox

MMF:khh

Enclosure: as stated

cc: Jeffrey M. Nelson, Esq. (via E-mail: jnelson@ors.sc.gov)

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BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2021-___-C

IN RE:

Application of Palmetto Telephone Communications, LLC)
For Designation as an Eligible Telecommunications Carrier)
In Certain Census Blocks in Charleston County for)
Purposes of Receiving Federal Rural Digital Opportunity)
Fund ("RDOF") Phase I Support)
)

PALMETTO TELEPHONE COMMUNICATIONS, LLC APPLICATION FOR ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

Palmetto Telephone Communications, LLC ("PTC" or the "Applicant") is seeking designation as an Eligible Telecommunications Carrier ("ETC") in 59 eligible census blocks in 2 census block groups located in Charleston County (the "Proposed Service Area")[1] in order to receive federal support under Sections 214 and 254 of the Federal Telecommunications Act of 1996 and pursuant to the Federal Communications Commission's ("FCC's") Rural Digital Opportunity Fund ("RDOF") Phase I auction.

As demonstrated below, PTC meets all of the statutory and regulatory requirements for designation as an ETC in the Proposed Service Area. Furthermore, designation of PTC as an ETC in the Proposed Service Area will serve the public interest.

[1] *See* Exhibits A and B, list of Census Blocks and total number of locations by Census Block Group, and map showing location of Census Block Groups where PTC was the winning bidder in the RDOF Phase I auction.

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I. Contact Information

Applicant's name and address are as follows:

Palmetto Telephone Communications, LLC
P.O. Drawer 1577
2471 Jefferies Highway
Walterboro, SC 29488

Correspondence regarding this Application should be addressed to Applicant's counsel:

M. John Bowen, Jr.
Margaret M. Fox
BURR & FORMAN LLP
Post Office Box 11390
Columbia, South Carolina 29211
Telephone: (803) 799-9800
Email: jbowen@burr.com; pfox@burr.com

The name, title, address and telephone number of the person who should be contacted in connection with general management of the company is:

Jason J. Dandridge
Chief Executive Officer
Palmetto Telephone Communications, LLC
P.O. Drawer 1577
2471 Jefferies Highway
Walterboro, SC 29488
Telephone: (843) 538-9090
E-mail: jason.dandridge@prtc.us

II. Description of Applicant

PTC is a competitive local exchange carrier ("CLEC") and provides local exchange services and intrastate exchange access service within geographical areas established by the Public Service Commission of South Carolina (the "Commission"). PTC previously was designated as an ETC for Lifeline purposes in the Walterboro and Yemassee exchanges,[2] and in the St. George

[2] *See* Order No. 2012-739 in Docket No. 2012-236-C.

exchange.[3] PTC has authority to provide service as a CLEC in the areas for which it is seeking ETC designation.[4]

III. Background

A. Background on the RDOF Auction

On January 30, 2020, the FCC adopted the *Rural Digital Opportunity Fund Report and Order,*[5] establishing the framework for the RDOF including the use of reverse auctions in two phases. The RDOF was implemented to provide $20.4 billion to connect millions of rural homes and businesses to high-speed broadband networks as part of the FCC's biggest step to close the digital divide.[6] On July 11, 2020, the FCC adopted final procedures for Phase I of the RDOF Auction, which utilized competitive bidding to allocate up to $16 billion over ten years to service providers that commit to offer voice and broadband services to fixed locations in eligible unserved high-cost census blocks.[7]

B. PTC's Selection as a Winning Bidder

The RDOF Auction began on October 29, 2020 and completed on November 25, 2020. On December 7, 2020, the FCC issued a Public Notice, officially announcing the results of the competitive bidding.[8] The FCC selected PTC as a winning bidder for a total of 264 locations in 2 designated census block groups ("CBGs") in Charleston County, South Carolina, with a total

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[3] *See* Order No. 2020-747 in Docket No. 2020-208-C.
[4] *See* Order No. 2014-802 in Docket No. 2014-324-C.
[5] *See generally Rural Digital Opportunity Fund; Connect America Fund*, Order, 35 FCC Rcd 686 (2020) (*RDOF Auction Order).*
[6] *Id.*
[7] *See Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, Public Notice, FCC 20-77, 35 FCC Rcd 686 (2020) ("*Auction 904 Procedures Public Notice*"), ¶ 1.
[8] *See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidder Announced; FCC Form 683 Due January 29, 2021*, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, Public Notice, DA 20-1422, (rel. Dec. 7, 2020) ("*Auction 904 Results Notice*").

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support amount of $570,024.00.[9] As a winner in the RDOF Auction and a recipient of RDOF support, PTC is required to offer at least one standalone voice plan and one service plan providing broadband at speeds of at least 1 Gbps with a latency at or below 100 ms. PTC is required to build out to 40% of the requisite number of locations in South Carolina within three years of authorization.[10] This performance benchmark increases by 20% by the end of the fourth and fifth years of support.[11] By the end of year six, revised location totals will be announced.[12] If there are fewer locations than originally estimated by the cost model, PTC must serve the revised number of locations by the end of the sixth year of support.[13] If there are more locations than originally estimated by the cost model, PTC must serve the original number of locations estimated by the cost-model by the end of the sixth year of support and must serve the rest of the locations by the end of the eighth year of support.[14]

C. Need for Expedited ETC Designation

In order to be eligible for RDOF funds, PTC must be designated as an ETC in the Proposed Service Area. The FCC's rules for the RDOF Auction did not require that participants be an ETC as of the initial short-form application filing deadline.[15] Instead, a company that is awarded support is expected to obtain an ETC designation (encompassing receipt of high-cost support) for the areas covered by its successful bids within 180 days after being announced as a winning bidder.[16] Winning bidders must submit appropriate documentation of such ETC status to the FCC.[17] As noted, PTC has been selected as a winning bidder in the RDOF Auction for 59 eligible census

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[9] *Id.*, Attachment A at p. 19.
[10] *Auction 904 Procedures Public Notice*, ¶ 17.
[11] *Id.*
[12] *Id.*
[13] *Id.*
[14] *Id.*
[15] *Auction 904 Procedures Public Notice*, ¶ 136.
[16] *Id.*
[17] *Id.*

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blocks in South Carolina. Because the timeframe for PTC to obtain ETC designation is short and the consequences of failure to do so are severe, PTC respectfully requests that the Commission review this Application promptly and grant PTC ETC designation in the Proposed Service Area on an expedited basis.

IV. Authority to Designate PTC as an ETC

Section 214(e)(2) gives States the primary responsibility for granting ETC status.[18] This section of the Act provides further: "Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements [set forth in Section 214(e)(1) for the ETC designated area]."[19]

PTC is a common carrier as defined in the Act. 47 USC § 153(11) defines a common carrier as "any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy, except where reference is made to common carriers not subject to this chapter; but a person engaged in radio broadcasting shall not, insofar as such person is so engaged, be deemed a common carrier."[20] PTC currently provides telecommunications service as a common carrier and intends to do so in the Proposed Service Area.

[18] 47 U.S.C. § 214(e)(2).
[19] *Id.*
[20] 47 USC § 153(11).

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PTC's request for designation as an ETC in the Proposed Service Area is in the public interest, because PTC seeks designation for purposes of receiving federal support to provide high-speed Internet service to unserved areas of South Carolina.

As demonstrated below, PTC meets the requirements set forth in section 214(e) in the areas for which it seeks designation as an ETC.

V. PTC Satisfies All the Requirements for Designation as an ETC

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

> (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and
> (B) advertise the availability of such services and the charges therefor using media of general distribution.

A. PTC Will Offer Supported Services Through its Own Facilities or Through a Combination of its Own Facilities and Resale

In order to be designated as an ETC, a carrier must offer the services that are supported by universal support mechanisms, which are voice telephony services and broadband service as defined in Section 54.101 of the FCC's Rules,[21] either through its own facilities or a combination of its own facilities and resale of another carrier's facilities. Section 54.101(a)(1) defines voice telephony services eligible for universal service support as:

> services [that] provide voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; 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

[21] 47 C.F.R. §54.101.

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> enhanced 911 systems; and toll limitation services to qualifying low-income consumers as provided in subpart E of this part.[22]

Section 54.101(a)(2) defines broadband Internet access services eligible for universal service support as:

> services [that] provide the capability to transmit data to 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.[23]

The FCC has additional buildout requirements for carriers that are awarded RDOF I auction support. Pursuant to these requirements, PTC must be able to provide Gigabit broadband to the 264 locations in the Proposed Service Area within a six-year period.[24]

B. PTC Will Offer and Provide Each of the Above-listed Services Through its Own Facilities

1. Voice Grade Access to the Public Switched Network or its Functional Equivalent

PTC will provide voice grade access to the Public Switched Network or its functional equivalent using its facilities-based network. PTC has a MetaSwitch softswitch located in its North Walterboro and Lodge data center that will be used to provide voice services to the RDOF areas. The switch currently has enough capacity to easily handle the RDOF customers. It is connected to the AT&T Charleston, SC tandem and connects directly to the company's underlying long distance carrier via two 1G connections and numerous TDM circuits. The switch and the connection to the world will be shared between the RDOF areas and the existing customers.

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[22] 47 C.F.R. §54.101(a)(1).
[23] 47 C.F.R. §54.101(a)(2).
[24] *RDOF Auction Order* at ¶ 45.

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2. Minutes of Use for Local Service Provided at No Additional Charge to End Users

PTC will offer voice products in the Proposed Service Area provisionally awarded to PTC. FCC regulations require that an ETC applicant "demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation."[25] The FCC further defines local usage as a measure of minutes of use of exchange service provided for a fee and without an additional charge to end users. PTC will offer local service plans comparable to those offered by the incumbent local exchange carrier(s) in the areas in which it seeks ETC designation.

3. Access to Emergency Services

PTC will provide access to emergency services through access to public service answering points ("PSAPs") by dialing "911" in order to reach emergency services. The requirement that ETCs offer access to 911 or enhanced 911 ("E911") applies only "to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems."[26] PTC satisfies this requirement by providing its customers with access to enhanced emergency services by dialing "911." As an ETC, PTC will be able to expand its coverage area to allow greater access to emergency services for its customers in remote and currently unserved areas for which it seeks ETC designation.

4. Lifeline and Toll Limitation Services

PTC will offer Lifeline discounts to qualifying customers and comply with federal Lifeline requirements in fulfilment of the requirement that ETCs offer Lifeline discounts to qualifying customers. Toll limitation service "denotes either toll blocking or toll control service for [ETCs]

[25] 47 C.F.R. 54.202 (a)(1)(ii)(4).
[26] 47 C.F.R. § 54.101(a)(5).

that are incapable of providing both services" or denotes both toll blocking and toll control service for ETCs that are capable of providing both services.[27] PTC is able to provide both toll blocking and toll control services, or either of those services, and will provide toll limitation service in the Proposed Service Area.

5. PTC Will Advertise its Universal Service Offerings

PTC commits to advertise the availability of, and charges for, the supported services using media of general distribution, consistent with its existing advertising practices. The advertising will occur through a combination of media channels, such as the local newspapers in each community, website, TV ads and social media. PTC will advertise these offerings in a manner that is designed to fully inform potential customers of the services available to them, to disclose all associated rates, and to insure that qualifying low-income individuals are informed about the availability and cost of Lifeline programs.

C. PTC Meets the Additional Eligibility Criteria Adopted by the FCC

In its *2005 ETC Order,*[28] the FCC adopted additional criteria that all ETC applicants must satisfy in order to be granted ETC status. The criteria, as set forth in Section 54.202 of the FCC's Rules, require that an ETC applicant must: (1) certify that it will comply with the service requirements applicable to the support that it receives; (2) submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area; (3) demonstrate its ability to remain functional in emergency situations; (4)

[27] *Id.* 47 C.F.R. § 54.404((b) defines toll blocking as "a service provided by an [ETC] that lets subscribers elect not to allow the completion of outgoing toll calls from their telecommunications channel" while 47 C.F.R. § 54.404(c) defines toll control as "a service provided by an [ETC] that allows subscribers to specify a certain amount of toll usage that may be incurred on their telecommunications channel per month or per billing cycle."

[28] *Federal-State Joint Board on Universal Service,* CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("*2005 ETC Order*").

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demonstrate that it will satisfy consumer protection and service quality standards.[29] To the extent applicable, PTC will meet these additional criteria.

1. PTC Certifies that it Will Comply with Service Requirements Applicable to the Support that it Receives

In its *2005 ETC Order*, the FCC required that an ETC applicant "make specific commitments to provide service to requesting customers in the service areas for which it is designated as an ETC."[30] Specifically, the FCC found that

> if the ETC's network already passes or covers the potential customer's premises, the ETC should provide service immediately. In those instances where a request comes from a potential customer within the applicant's licensed service area but outside its existing network coverage, the ETC applicant should provide service within a reasonable period of time if service can be provided at reasonable cost by: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting the nearest cell tower; (4) adjusting network or customer facilities; (5) reselling services from another carrier's facilities to provide service; or (6) employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment.[31]

The FCC stated that if an ETC applicant determines that it cannot serve the customer using one or more of these methods, "then the ETC must report the unfulfilled request to the [FCC] within 30 days after making such determination."[32]

PTC hereby certifies that it will comply with the service requirements applicable to the supported voice and broadband services that it will be offering in the Proposed Service Area, including the requirements for the RDOF I auction program.

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[29] *See,* 47 C.F.R § 54.202. For recipients of CAF Phase II support, the FCC waived the requirement that winning bidders seeking an FCC ETC designation file a five-year improvement plan and demonstrate that it will satisfy applicable consumer protection and service quality standards. *See* Connect America Fund, et al., WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949 (2016) (*CAF Phase II Auction Order*) at ¶¶ 157-68. Likewise, for purposes of the Rural Digital Opportunity Fund, the FCC incorporated by reference the analysis of forbearance factors that it considered and found warranted in CAF Phase II. *See RDOF Auction Order* at p. 44, n. 271; *see also Auction 904 Procedures Order* at ¶ 136 and n. 308.
[30] *2005 ETC Order* at ¶ 22.
[31] *Id.* (footnotes omitted).
[32] *Id.*

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2. Five-Year Plan for Proposed Improvements or Upgrades

For recipients of RDOF I support, the FCC waived the requirement that winning bidders seeking an FCC ETC designation file a five-year improvement plan and demonstrate that it will satisfy applicable consumer protection and service quality standards.[33]

The FCC found that the more specific measures it had adopted for federal funding recipients to track deployment, including annual reporting of service to geocoded locations and certifications of compliance with benchmark milestones, provided a "more defined yardstick by which to measure their progress towards the universal availability of voice and broadband service in their areas."[34] Likewise, PTC requests that the Commission waive the requirements of Reg. 103-690.C.(a)(1)(B) to submit a two-year plan describing the proposed improvements or upgrades, and the requirement of Reg. 103-690.1.B(b)(1) to file annual reports updating the initial two-year plan. PTC will comply with the more stringent detailed broadband buildout obligations imposed by the FCC. Specifically, each support recipient must complete construction and begin commercially offering service to 40 percent of the requisite number of locations in a state by the end of the third full calendar year following funding authorization, and to an additional 20 percent in each subsequent year, with 100 per cent by the end of the sixth year.[35] To monitor compliance, the FCC has adopted reporting requirements that are essentially the same as those adopted for the CAF Phase II auction.[36] Those include: "reporting a list of geocoded locations each year to which the support recipient is offering the required voice and broadband services, making a certification when the support recipient has met service milestones, and submitting the annual FCC Form 481

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[33] *See infra*, n. 29.
[34] *See* WCB Reminds Connect America Fund Phase II Auction Applicants of the Process For Obtaining a Federal Designation as an Eligible Telecommunications Carrier, Public Notice, WC Docket Nos. 09-197, 10-90, DA 18-714 (rel. July 10, 2018) at pp 4-5, and p. 5, fn 34 (*quoting* 2016 Rate-of-Return Reform Order, 31 FCC 3166, 3168, ¶ 216).
[35] *See RDOF Auction Order* at ¶ 45.
[36] *See id.* at ¶ 56.

report."[37] If a recipient fails to offer service to the required number of locations by a service milestone, FCC rules require quarterly status reporting and, in some instances, support is withheld until compliance is achieved.[38] Recipients are also subject to requirements to conduct quarterly measurements of speed and latency and annually report network performance.[39]

3. PTC Will Remain Functional in Emergency Situations

PTC hereby certifies that it is able to function in emergency situations as set forth in §54.202(a)(2).[40] PTC's voice and broadband network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2).

PTC also complies with the FCC's backup power requirements that became effective in 2015.[41]

4. PTC Will Satisfy Consumer Protection and Service Quality Standards

In establishing this certification in its *2005 ETC Order,* the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."[42] The FCC found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement, and that the sufficiency of other commitments would be considered on a case-

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[37] *Id.* at ¶ 17 (citations omitted).
[38] *Id.* at ¶ 58.
[39] *See* Connect America Fund, WC Docket No. 10-90, Order, DA 18-710 (rel. July 6, 2018).
[40] Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of maintaining traffic spikes resulting from emergency situations."
[41] 47 C.F.R. § 12.5.
[42] *2005 ETC Order* at ¶ 28

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by-case basis.[43] In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."[44]

As stated in footnote 29 herein, the FCC has waived the requirement that winning bidders seeking an FCC ETC designation certify that it will satisfy consumer protection and service quality standards. Despite this fact, PTC hereby certifies that it is complying with applicable service quality standards and consumer protection rules, including complying with Lifeline service standards pursuant to 47 C.F.R. § 54.408 including minimum broadband speed requirements, data usage allowance, and accessibility to WIFI devices.

VI. PTC will Satisfy Applicable State-Specific ETC Requirements

Commission Regulation 103-690.C. provides the requirements for initial designation as an ETC. The state regulation generally tracked the corresponding federal regulations at the time the state regulation was promulgated in 2008. Since that time, the federal regulations have changed, and some of the state-specific requirements may not be applicable.

PTC commits to providing service throughout its proposed designated service area to all customers making a reasonable request for service, as required by R. 103-690.C.(1)(A).

As explained in Section V.C.2. above, PTC requests a waiver of the requirement to submit a 2-year plan pursuant to R. 103-690.C.(1)(B), and the requirement of Reg. 103-690.1.B(b)(1) to file annual reports updating the initial two-year plan, for the reasons stated therein. The

[43] *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new services; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

[44] *Id.* at n. 72.

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Commission may waive a rule or regulation where circumstances indicate that a waiver is appropriate, upon a finding that such waiver is not contrary to the public interest.[45] PTC respectfully submits that the requirement should be waived in this case. In lieu of filing the two-year plan provided for in Reg. 103-690.C.(a)(1)(B), PTC will make available to the Commission and ORS upon request all reports it is required to file with the FCC in connection with the RDOF I funding for the Proposed Service Area.

PTC has demonstrated its ability to remain functional in emergency situations, as explained in Section V.C.3. above, in compliance with R. 103-690.C.(2). PTC has demonstrated that it will satisfy applicable consumer protection and service quality standards, as explained in Section V.C.4. above, in compliance with R. 103-690.C.(3).

PTC will offer local service plans comparable to those offered by the incumbent LEC in the service areas for which it seeks designation, as explained in Section V.B.2. above, in compliance with R. 103-690.C.(a)(4).

Attached to this Application, as required by R. 103-690.C.(a)(5)-(7), is the Affidavit of Jason J. Dandridge, an officer of PTC, certifying that PTC acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area; that PTC does offer or will offer the services supported by federal universal service support by using its own facilities or a combination of its own facilities and resale of another carrier's services; and that it does or will advertise in a media of general distribution the availability of such services, including Lifeline services and the applicable charges.

[45] *See* S.C. Code Ann. Regs. 103-803.

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VII. Granting This Application Will Serve the Public Interest

PTC's designation as an ETC for the Proposed Service Area will allow it to build out unserved or underserved areas using federal funding, bringing the benefits of high-speed broadband to these areas. Accordingly, it is in the public interest to designate PTC as an ETC in the RDOF I Proposed Service Area. Once the Commission grants PTC's ETC application and the FCC approves PTC for funding, PTC will receive $570,024.00 over a ten-year period which it will use to provide Gigabit broadband to those residing and working in the Proposed Service Area.

VIII. Requests for Waiver of Commission Regulations

In addition to the waiver requested in Section V.C.2. above of the requirement to file a two-year plan and annual updates, PTC respectfully requests a waiver of R. 103-690.C.(b) to the extent it would prohibit designation of PTC as an ETC in an area smaller than a wire center. As described above, the FCC has established a mechanism to ensure the deployment of broadband to unserved and underserved areas. It has done so by undertaking a granular analysis, at the Census Block level, to target funding to such areas. If the Commission were to deny PTC the designation it requests at the Census Block level in order to obtain available federal funding to serve the Proposed Service Area, those areas likely would remain unserved or underserved. Therefore, it is in the public interest to grant the requested waiver of that portion of R. 103-690.C(b) that provides that the Commission shall not designate an ETC service area smaller than an entire wire center.

IX. Conclusion and Request for Expedited Review

In order to be eligible for the federal funding available to PTC under RDOF I, the FCC requires that PTC be designated as an ETC in the areas for which it seeks support not later than June 7, 2021. For the reasons stated above, granting this Application will serve the public interest by allowing PTC to use available federal funding to bring robust broadband service to certain

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unserved areas of the State. PTC respectfully requests that the Commission grant this application in an expeditious manner to enable it to meet the FCC's deadline. Attached hereto is the sworn Affidavit of Jason J. Dandridge, an officer of PTC, attesting to the truth and accuracy of this Application, and making the certifications required by Commission Regulation 103-690.C.(a)(5)-(7).

Respectfully submitted,

M. John Bowen, Jr.
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Attorneys for Palmetto Telephone Communications, LLC

Columbia, South Carolina

January 6, 2021

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EXHIBIT A

CENSUS BLOCK GROUPS AND NUMBER OF LOCATIONS:

CBG#	State	County	Locations
450190024003	SC	Charleston	143
450190025024	SC	Charleston	121

ELIGIBLE CENSUS BLOCKS WITHIN THE CENSUS BLOCK GROUPS (*I.E.* CENSUS BLOCKS FOR WHICH PTC SEEKS ETC DESIGNATION):

Block-ID	State Abbr	County-Name	CBG_id
450190024003018	SC	Charleston	450190024003
450190024003044	SC	Charleston	450190024003
450190024003065	SC	Charleston	450190024003
450190024003067	SC	Charleston	450190024003
450190024003076	SC	Charleston	450190024003
450190024003081	SC	Charleston	450190024003
450190024003087	SC	Charleston	450190024003
450190024003095	SC	Charleston	450190024003
450190024003100	SC	Charleston	450190024003
450190024003111	SC	Charleston	450190024003
450190024003112	SC	Charleston	450190024003
450190024003114	SC	Charleston	450190024003
450190024003115	SC	Charleston	450190024003
450190024003119	SC	Charleston	450190024003
450190024003120	SC	Charleston	450190024003
450190024003123	SC	Charleston	450190024003
450190024003124	SC	Charleston	450190024003
450190024003159	SC	Charleston	450190024003
450190024003161	SC	Charleston	450190024003
450190024003178	SC	Charleston	450190024003
450190024003181	SC	Charleston	450190024003
450190024003186	SC	Charleston	450190024003
450190024003188	SC	Charleston	450190024003
450190024003191	SC	Charleston	450190024003
450190024003193	SC	Charleston	450190024003
450190024003194	SC	Charleston	450190024003
450190024003196	SC	Charleston	450190024003
450190024003197	SC	Charleston	450190024003
450190024003200	SC	Charleston	450190024003
450190024003216	SC	Charleston	450190024003
450190024003217	SC	Charleston	450190024003

Block-ID	State Abbr	County-Name	CBG_id
450190024003230	SC	Charleston	450190024003
450190024003240	SC	Charleston	450190024003
450190025024000	SC	Charleston	450190025024
450190025024004	SC	Charleston	450190025024
450190025024021	SC	Charleston	450190025024
450190025024024	SC	Charleston	450190025024
450190025024026	SC	Charleston	450190025024
450190025024027	SC	Charleston	450190025024
450190025024028	SC	Charleston	450190025024
450190025024029	SC	Charleston	450190025024
450190025024033	SC	Charleston	450190025024
450190025024035	SC	Charleston	450190025024
450190025024036	SC	Charleston	450190025024
450190025024038	SC	Charleston	450190025024
450190025024063	SC	Charleston	450190025024
450190025024064	SC	Charleston	450190025024
450190025024065	SC	Charleston	450190025024
450190025024067	SC	Charleston	450190025024
450190025024068	SC	Charleston	450190025024
450190025024069	SC	Charleston	450190025024
450190025024070	SC	Charleston	450190025024
450190025024071	SC	Charleston	450190025024
450190025024074	SC	Charleston	450190025024
450190025024098	SC	Charleston	450190025024
450190025024099	SC	Charleston	450190025024
450190025024107	SC	Charleston	450190025024
450190025024108	SC	Charleston	450190025024
450190025024118	SC	Charleston	450190025024

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EXHIBIT B

Map of Census Block Groups

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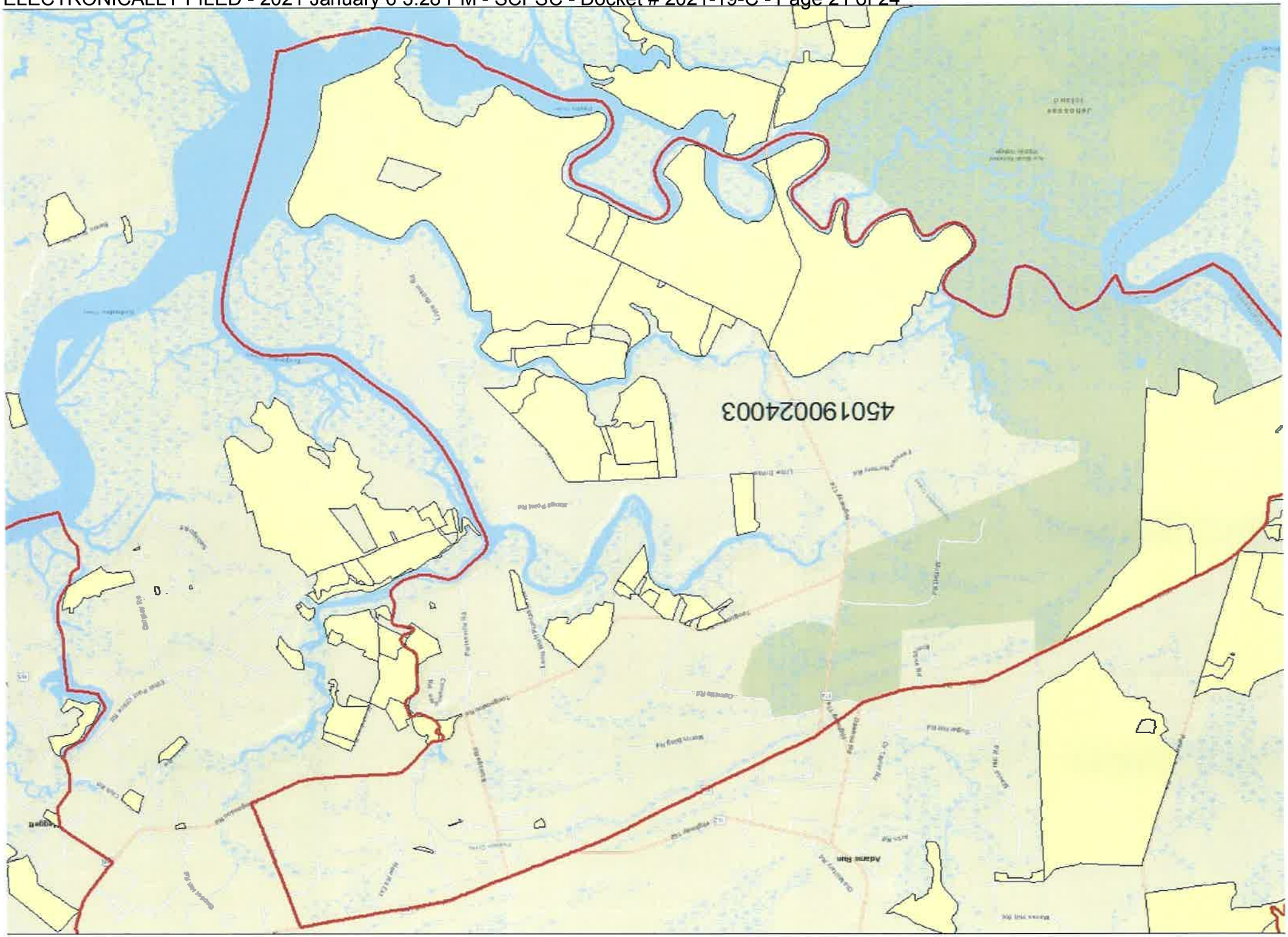
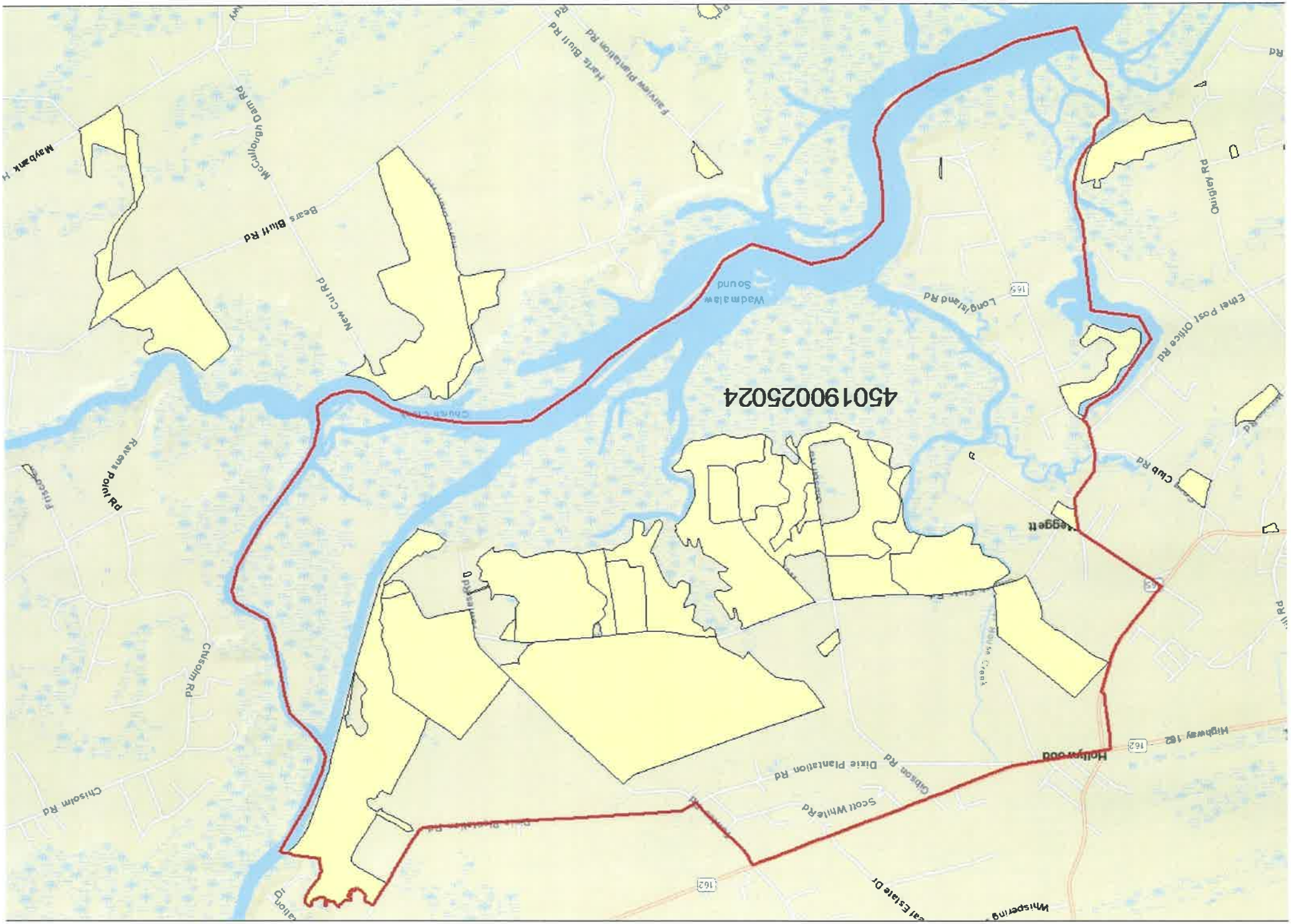

4501900240 03


4501900250 24
Wadmalaw Sound
Long Island Rd
Ethel Post Office Rd
Cuttigny Rd
Club Rd
Maggett
Highway 162
Holbyrwood
Cibbon Rd
Dixie Plantation Rd
Scott White Rd
Whispering
Chisolm Rd
Ravens Point Rd
New Cut Rd
McCullough Dam Rd
Bears Bluff Rd
Fairview Plantation Rd
Hate Bluff Rd

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BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2021-___-C

IN RE:

Application of Palmetto Telephone Communications, LLC)
For Designation as an Eligible Telecommunications Carrier)
In Certain Census Blocks in Charleston County for)
Purposes of Receiving Federal Rural Digital Opportunity)
Fund ("RDOF") Phase I Support)
)

STATE OF SOUTH CAROLINA

COUNTY OF COLLETON

AFFIDAVIT

PERSONALLY APPEARED BEFORE ME the undersigned WHO, BEING DULY SWORN, deposed and said:

1. My name is Jason J. Dandridge I am employed by Palmetto Telephone Communications, LLC (the "Company"), as its Chief Executive Officer. I am an officer of the Company and am authorized to give this Affidavit on behalf of the Company.

2. I have read the foregoing Application in the above-captioned matter and know the contents thereof; and said contents are true and accurate.

3. The Company acknowledges that the Federal Communications Commission may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area.

4. The Company does offer or will offer the services that are supported by the federal universal service support mechanisms by using its own facilities or a combination of its own facilities and resale of another carrier's services.

5. The Company does or will advertise in a media of general distribution the availability of such services, including Lifeline services and the applicable charges.

FURTHER AFFIANT SAYETH NOT.

Jason J. Dandridge
Chief Executive Officer
Palmetto Telephone Communications, LLC

Subscribed to and sworn before me this 5th day of January 2021.

Valerie Ancrum
NOTARY PUBLIC FOR SOUTH CAROLINA

Valerie Ancrum
Printed Name of Notary

My Commission Expires: 7-15-2029

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