BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Application of Windstream Communications, LLC for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Auction Support	)))))	**File No. TA-2021-0354**

ORDER DIRECTING NOTICE, SETTING INTERVENTION DEADLINE, AND DIRECTING STAFF TO FILE A RECOMMENDATION

Issue Date: May 3, 2021 Effective Date: May 3, 2021

On April 16, 2021, Windstream Communications (Windstream) filed an application for designation as a wireless Eligible Telecommunications Carrier. The Commission issued a notice of deficiency because the application was not signed by a member of The Missouri Bar. Windstream corrected the deficiency on May 3, 2021.

The Commission will direct its Data Center to issue notice of the application, set a deadline for requests to intervene, and direct the Staff of the Commission to file a recommendation.

THE COMMISSION ORDERS THAT:

1. The Commission's Data Center shall send notice of this application to all local exchange carriers certificated to provide service in Missouri.

2. Requests to intervene shall be filed with the Commission no later than May 17, 2021.

3. The Staff of the Commission shall file a recommendation no later than May 25, 2021.

4. This order shall be effective when issued.

BY THE COMMISSION

Morris L. Woodruff
Secretary

Ronald D. Pridgin, Regulatory Law Judge,
by delegation of authority pursuant
to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 3rd day of May, 2021.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Application of Windstream Communications, LLC for Designation as an Eligible Telecommunications Carrier to receive Rural Digital Opportunity Fund Auction Support	Case No. TA-2021-0354

APPLICATION OF WINDSTREAM COMMUNICATIONS, LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER TO RECEIVE RURAL DIGITAL OPPORTUNITY FUND AUCTION SUPPORT

Windstream Communications, LLC ("WC" or "Company") requests the Missouri Public Service Commission (the "Commission") approve its request for designation as an Eligible Telecommunications Carrier ("ETC") covering 13 census block groups in 122 eligible census blocks located in Barry, Harrison, McDonald, Montgomery, Newton, Pike, Pulaski and Ripley Counties (collectively, the "Census Block Groups" and each, individually, a "Census Block Group") identified in **Exhibit A**. This petition is submitted pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"),[1] Sections 54.201 and 54.202 of the Federal Communications Commission ("FCC") rules,[2] and the Commission's requirements in 20 C.S.R. 4240-31.015 and -31.016. WC's request for ETC designation relates to certain Missouri areas covered by the FCC's Rural Digital Opportunity Fund Phase I Auction (Auction 904) (the "RDOF Auction").

WC further respectfully requests that the Commission issue an order designating WC as an ETC in the state of Missouri on or before June 7, 2021, pursuant to the Act[3] and FCC rules and the

[1] 47 U.S.C. § 214(e)(2)
[2] 47 C.F.R. §§ 54.201 and 54.202.
[3] 47 U.S.C. § 214(e)(2)

Orders of this Commission, or order any other relief on a timely basis as may be appropriate. In support of this Petition, WC states as follows:

I. Company Overview

WC is a Delaware limited liability company with a place of business at 4001 North Rodney Parham Road, Little Rock, Arkansas 72212. WC is authorized by the Commission to provide interexchange and VoIP telecommunications services in Missouri.[4] WC is authorized to do business in Missouri, and copies of its registration as a company doing business in Missouri are on file with Secretary of State.

Petitioner WC is a wholly owned subsidiary of Windstream Holdings II, LLC (hereinafter, "Windstream") and Windstream Services, LLC (hereinafter, "Windstream Services"), both Delaware limited liability companies also headquartered at the same address as WC. Windstream, through its subsidiaries, is a leading provider of advanced network communications and technology solutions for consumers, small businesses, enterprise organizations and carrier partners across the U.S. Windstream provides voice and data services that enhance the communication capabilities of consumers and businesses throughout Missouri. Windstream's consumer and small business segment includes approximately 1.4 million residential and small business customers that receive voice, broadband, entertainment, and security solutions. Windstream's enterprise business segment offers services such as software-defined wide area networking ("SD-WAN") and unified communications as a service ("UcaaS") to businesses across the U.S.

Windstream does not provide telecommunications services in its own right. Rather, it owns and operates a number of licensed telecommunications providers in all states and the District of

[4] *See* Commission Case No. XA-2006-0271, March 6, 2006 (IXC) and File No. DA-2018-0183, February 3, 2018 (VoIP).

Columbia, many of which also hold authority from the FCC to provide domestic interstate and international telecommunications services.

WC has operated as an interexchange provider in the state for almost 15 years.[5] WC's incumbent affiliate has operated in Missouri for over 60 years. Combined, WC and its other CLEC and ILEC affiliates have provided telecommunications services for over 100 years. WC is managed by the same company officers and management team that oversees its affiliates. WC's affiliates also have successfully participated in federal broadband programs such as the Connect America Fund (both phases) and the Rural Utilities Service program. In addition, WC's affiliates have previously participated in and will continue to participate in state broadband expansion programs. As a result, WC has the necessary experience to implement and execute the requirements both under the RDOF program, as well as federal and state ETC obligations.

II. Rural Digital Opportunity Fund Participation

On December 7, 2020, the FCC announced that Windstream Services, was a winning bidder in Auction 904 for census block groups in 18 states, including Missouri.[6] As a condition of receiving funding, WC must obtain from either the relevant state commission, or from the FCC where such state commission lacks jurisdiction, ETC designation to cover its winning bid areas by June 7, 2021.[7] WC is in the process of seeking designation as an ETC in each of the 18 states in which it was selected as a winning bidder and specifically seeks such designation from Missouri for the 13 eligible census block groups in the state for which it has been announced as a winning bidder in Auction 904.[8]

---

[5] *See* Commission Case No. XA-2006-0271 and DA-2018-0183-.
[6] *RDOF Winning Bidder PN*, Attach. A at pp. 8-9.
[7] *RDOF Winning Bidder PN* at ¶ 36. The FCC "will presume that an entity acted in good faith if the entity files its ETC application within 30 days of the release of" the RDOF Winning Bidder PN. *Id.* at ¶ 37.
[8] *See* Exhibit A for the identified census block groups in Missouri, along with a map of the same.

Windstream is committed to closing the digital broadband divide in the United States by working to provide greater access to voice and broadband services in unserved, rural, and or high-cost areas. Being awarded over $523 million in RDOF funding across 18 states, Windstream plans to bring fiber-to-the-home to nearly 200,000 locations.

A. Winning Bids Assigned to WC

Per the FCC's procedures for the RDOF Auction, winning bidders could divide and/or wholly assign their bids to affiliated operating companies.[9] Windstream Services assigned its winning RDOF Auction bids for the Census Block Groups to WC, an approved long distance provider in Missouri.[10] As assignee of the Missouri bids, WC must satisfy certain public interest requirements, including eventual designation as an ETC for the respective RDOF Census Block Groups originally awarded to Windstream Services. By assignment, WC, has been selected to receive $186,520 over a ten-year period ($18,652 annually) to provide services to 13 census block groups in Missouri. The census blocks and census block groups associated with WC's winning bids are identified in **Exhibit A**, as well as a map illustrating the RDOF census blocks.

B. Communications and Correspondence

The legal name, address and telephone number of WC is as follows:

Windstream Communications, LLC
4001 North Rodney Parham Road
Little Rock, AR 72212
(501) 748-7000

Pleadings, orders, notices or other correspondence and communications regarding this Petition should be provided to:

[9] *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 (June 11, 2020) *("Auction 904 Procedures Public Notice"),* at ¶ 43.

[10] As noted in Section IV, WC intends to meet its RDOF voice obligations via VoIP services, WC plans to file a separate CLEC Certification Application with the Commission.

Carol Keith
Nicole Winters
Windstream
4001 North Rodney Parham Road
Little Rock, AR 72212
501-748-6313
Carol.Keith@windstream.com
Nicole.Winters@windstream.com

III. Request for Expedited Consideration

In order to be eligible for RDOF funds, WC must be designated as an ETC in the Census Block Groups. 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.[11] Instead, a company that is awarded support is expected to obtain an ETC designation for the areas covered by its successful bids within 180 days after being announced as a winning bidder.[12] Winning bidders must submit appropriate documentation of such ETC status to the FCC.[13] As noted, WC has been selected as a winning bidder in the RDOF Auction for 13 eligible census block groups in Missouri. Because the timeframe for WC to obtain ETC designation is short and the consequences of failure to do so would prevent WC from expanding service to the Census Block Groups, WC respectfully requests that the Commission review this application promptly and grant ETC designation to WC on an expedited basis.

IV. WC Meets the Requirements for ETC Certification

WC, meets the requirements of ETC designations. WC will comply with the requirements under Section 214(e)(2) of the Act, provides all of the services and functionalities supported by the federal universal service program under 47 C.F.R. § 54.101 and will do so in the Census Block Groups that are the subject of this petition.

---

[11] *Auction 904 Procedures Public Notice,* at ¶ 136.
[12] *Id.*
[13] *Id.*

A. WC Will Provide Service as a Common Carrier (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d))

For purposes of this designation, WC will offer a proven fiber-to-the-premise network architecture to deliver broadband and VoIP services. WC's affiliates have extensive experience deploying this type of network as it has constructed this same network to over 477,000 consumer and business locations in 18 states. Subscriber voice traffic will transit Windstream Service's highly redundant, all-fiber network and connect with Windstream Services' wholly-owned switching network, which currently supports nearly 2 million voice lines across 18 states. As such, with respect to the VoIP service it plans to deploy in the areas listed in **Exhibit A**, WC is a common carrier.

B. WC Satisfies All Federal Requirements for ETC Designation

Section 214(e) of the Act requires a carrier seeking ETC designation to certify that it offers services supported by the federal universal service support mechanisms under Section 254(c) using either its own facilities or a combination of its own facilities and the resale of services of another carrier. Section 214(e) further requires the carrier to advertise the availability and charges for such services using media of general distribution.

WC hereby commits and certifies that it will offer, either directly or through a resale relationship, voice and broadband services to those areas within the Census Block Groups. WC will further ensure that both the availability and costs for such services will be advertised using appropriate media. WC further commits that it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the universal service support is intended. *See* 47 U.S.C. § 254(e) and 47 C.F.R. § 54.7(a).

C. WC Will Offer the Services Supported by the Federal Universal Service Support Mechanisms (47 C.F.R. § 54.101)

WC will offer the following voice telephony and broadband services that are supported by federal universal service support mechanisms:[14]

a. Voice Grade Access to the PSTN. WC will meet this requirement through the provision of fiber-based VoIP service that is interconnected to the PSTN, which will be offered as a standalone telephony service throughout its territories listed in **Exhibit A**.[15] The service will include minutes of use for local service provided at no additional charge to end users (specifically, WC's service plans will offer unlimited usage within the United States); and access to emergency services via 911 and E-911, where implemented by local government or other public safety organizations. WC will also provide toll limitation services to qualifying low-income consumers or may charge the same prices for toll and non-toll calls in accordance with the FCC's rules.[16]

b. Broadband Internet Access Services. WC will offer fiber-based broadband Internet access service that provides 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.[17] End user connections will be routed to a local or regional exchange, where WC will interconnect through an Internet exchange point that carries traffic to all or substantially all Internet end points.

WC commits to provide these services consistent with applicable universal service support rules and will meet the service requirements for RDOF Phase I support.[18] WC will offer at least one standalone voice plan and one service plan that provides high speed broadband. These plans will be offered at rates that are reasonably comparable to rates offered in urban areas.[19] WC will be responsible for providing customer care, providing quality of service guarantees, and meeting the FCC's universal service fund-related requirements.[20]

---

[14] 47 C.F.R. § 54.101.
[15] *See id*. § 54.101(b).
[16] *See id*. § 54.101(a)(1).
[17] *See id*. § 54.101(a)(2).
[18] *See id*. § 54.101(c).
[19] *See Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 707-08, paras. 42-43.
[20] *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 No. 09-197 et al., 33 FCC Rcd 6696, 6698 (WCB 2018) ("*ETC Designation Public Notice"*); *see also RDOF Auction Procedures PN* at 6129, para. 139.

WC also will make available Lifeline services to qualifying low-income consumers pursuant to the FCC's rules at all locations in Missouri where it is authorized to receive RDOF support.[21]

D. WC Will Provide Service Using Its Own Facilities or a Combination of its Own Facilities and Resale of Another Carrier's Services (47 U.S.C. § 214(e)(1)(A), 47 C.F.R. § 54.201(d)(1))

WC will primarily offer supported services using its own facilities, and may use a combination of its own facilities and resale of another carrier's services depending on the deployment scenario.[22] WC will have the exclusive right to use the broadband facilities it deploys to offer the supported services.

E. WC Will Provide Service Throughout Its Designated Service Area (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d))

WC commits to providing the supported services throughout the Census Block Groups identified in **Exhibit A**, consistent with all applicable requirements.[23]

F. WC Will Advertise the Availability of Its Services and Charges Using Media of General Distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2))

WC will advertise the availability of and charges for its supported service offerings using media of general distribution, and will undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements.[24] WC will offer and advertise its VoIP and broadband services through various marketing channels, including but not limited to direct mail, email, local and community outreach events, and targeted online electronic

---

[21] 47 C.F.R. §§ 54.101(d) and 54.405(a); *see also RDOF Auction Procedures PN,* 35 FCC Rcd at 6128 (stating, "[e]ach Auction 904 support recipient must offer Lifeline voice and broadband service throughout the eligible areas covered by its winning bids to qualifying low-income consumers pursuant to the Lifeline program rules.").
[22] *See* 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.101; *see also ETC Designation Public Notice,* 33 FCC Rcd at 6698 ("Facilities are the ETC's 'own' if the ETC has exclusive right to use the facilities to provide the supported services or when service is provided by any affiliate within the holding company structure.").
[23] 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).
[24] See 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d).

advertising. In addition, WC will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

G. WC Meets the Additional Requirements for Designation as an ETC (47 C.F.R. § 54.202)

The FCC's March 17, 2005, *ETC Criteria Order* sets forth certain additional elements for ETC applications.[25] The applicable FCC criteria, promulgated at 47 C.F.R. § 54.202(a), require that an ETC applicant must[26]:

- Certify it will comply with the service requirements applicable to the support that it receives;
- Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area;
- Demonstrate the ability to remain functional in emergency situations; and
- Demonstrate that it will satisfy applicable consumer protection and service quality standards.

1. WC Will Comply with Service Requirements Applicable to the Support it Receives

Pursuant to 47 C.F.R. § 54.202(a)(1)(i), WC hereby certifies that it will comply with the service requirements applicable to the supported services that it will be offering in the Census Block Groups. Upon request, WC will provide timely service to all customers within the Census Block Groups where WC's network will provide coverage. If a potential customer is within WC's licensed area but outside of its existing network coverage, WC will work to provide service at a reasonable cost. WC further certifies that it will comply with any applicable requirements for service specific to the RDOF Auction.

---

[25] *See Federal-State Board on Universal Service*, CC Docket 96-45, Report and Order, 20 FCC Rcd 6371 (March 17, 2005) ("*ETC Criteria Order*").
[26] *See* 47 C.F.R. § 54.202(a)(1)-(3).

2. Five-Year Plan Requirement Has Been Waived

Normally, the FCC requires that an ETC applicant submit a five-year plan describing proposed improvements or upgrades to the applicant's network throughout its proposed service area. In this case, the FCC has waived the requirement that RDOF Auction winning bidders submit a five-year service improvement plan.[27] Accordingly, WC need not specifically demonstrate the existence of a five-year plan, as the underlying objective of furthering service access and public interest will be verified and assured through mechanisms specific to the Census Block Groups and the RDOF Auction.

3. WC Will Remain Functional During Emergencies

WC certifies that it is able to function in emergency situations as required under 47 C.F.R. § 54.202(a)(2). WC's voice and broadband network is designed to remain functional in emergency situations without an external power source, will remain functional using backup power, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required. *See* 47 C.F.R. § 54.202(a)(2). WC further monitors its networks with sophisticated equipment capable of detecting disruptions caused by emergency situations that allow WC to respond quickly.

4. WC Will Meet Consumer Protection and Service Quality Standards

The FCC provides that an ETC applicant must "demonstrate that it will satisfy applicable consumer protection and service quality standards." 47 C.F.R. § 54.202(a)(3). The FCC, however, waived the requirement that bidders seeking ETC designation certify that they will satisfy

[27] For recipients of Connect America Fund ("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. 1090 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949 (2016) *(CAF Phase II Auction Order)* at ¶¶ 157-68. Similarly, for purposes of the RDOF, 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 ¶ 95 & n. 271 and internal citations. *See also Auction 904 Procedures Order* at ¶ 136 & n. 308.

consumer protection and service quality standards.[28] To the extent necessary, WC requests a waiver of state requirements based on these waived FCC requirements.

5. WC Meets All State Requirements for ETC Designation

In addition to the foregoing, in accordance with the Commission's requirements for ETC designation under 20 C.S.R. 4240-31.016, WC states as follows:

1) WC is 100% owned by its direct parent company, Windstream Services, LLC. Windstream Services, LLC is 100% owned by its direct parent company Windstream Holdings II, LLC.

2) The names and titles of the corporate officers of WC are as follows:

   Tony Thomas, Chairman & CEO
   John Robert Gunderman, CFO
   Kristi Moody, EVP, General Counsel & Corporate Secretary

3) The following companies share common ownership or management with WC and both have received federal universal service funds as ETCs and participants in the federal Lifeline program:

Windstream Alabama, LLC	Alabama
Windstream Arkansas, LLC	Arkansas
Windstream Missouri, LLC	Arkansas/Missouri
Valor Telecommunications of Texas, LLC dba Windstream Communications Southwest	Arkansas/New Mexico/Oklahoma/Texas
Windstream Florida, LLC	Florida
Georgia Windstream, LLC	Georgia
Windstream Accucomm Telecommunications, LLC	Georgia
Windstream Georgia Communications, LLC	Georgia
Windstream Georgia Telephone, LLC	Georgia
Windstream Georgia, LLC	Georgia
Windstream Standard, LLC	Georgia
Windstream Iowa Communications, LLC	Iowa
Windstream Montezuma, LLC	Iowa
Windstream Kentucky East, LLC	Kentucky

[28] *See supra,* n. 20.

Windstream Kentucky West, LLC	Kentucky
Windstream Lakedale, Inc.	Minnesota
Windstream Mississippi, LLC	Mississippi
Windstream Nebraska, Inc.	Nebraska
Windstream New York, Inc.	New York
Windstream Concord Telephone, LLC	North Carolina
Windstream Lexcom Communications, LLC	North Carolina
Windstream North Carolina, LLC	North Carolina
Windstream Ohio, LLC	Ohio
Windstream Western Reserve, LLC	Ohio
Oklahoma Windstream, LLC	Oklahoma
Windstream Oklahoma, LLC	Oklahoma
Windstream Buffalo Valley, Inc.	Pennsylvania
Windstream Conestoga, Inc.	Pennsylvania
Windstream D&E, Inc.	Pennsylvania
Windstream Pennsylvania, LLC	Pennsylvania
Windstream South Carolina, LLC	South Carolina
Texas Windstream, LLC	Texas
Windstream Communications Kerrville, LLC	Texas
Windstream Sugar Land, LLC	Texas

4) In August 2012, Windstream Corporation former parent company of WC and its affiliates received charges from the Oklahoma Attorney General regarding allegations of bribery and conspiracy. The matter was dismissed in December 2012 and no further action has been taken. The allegations stemmed from an investigation into the then Superintendent of the Broken Arrow School District who attended a 2007 customer event hosted by Windstream.

5) Information about WC's services and rates can be found at: www.windstream.com

6) WC will comply with the Commission's ETC requirements identified in 4 C.S.R.240-31.015 with respect to its provision of RDOF supported services in the RDOF Census Blocks.

7) In this Application, WC is not applying for support from the Missouri universal service fund, as described at 20 C.S.R. 4240-31.016. WC reserves its right to request

such relief in the future if it is appropriate and in the public interest.

8) WC commits to notifying the Commission of any changes to its company contact information.

9) WC is certificated by the Commission to provide interexchange and VoIP services. WC is compliant with all applicable Commission reporting and assessment obligations.

10) WC is compliant with its contribution obligations to the federal universal service fund.

V. Public Interest

WC's designation as an ETC for the Census Block Groups will allow it to build out services to unserved areas using federal funding, bringing the benefits of added voice and high-speed broadband services to these areas. Accordingly, it is in the public interest to designate WC as an ETC in the Census Block Groups. Once the Commission grants WC's ETC petition and the FCC approves WC for funding, WC will receive $186,520.00 over a ten-year period to provide voice and broadband services to those residing and working in the Census Block Groups.

The availability of WC's RDOF supported voice and broadband services will have a positive effect on unserved areas in the Census Block Groups. WC is committed to expanding access to these services that will enable consumers to access new opportunities of all kinds, including education, healthcare, business, civic engagement, and personal connection. New opportunities may include starting a business, taking online classes, or seeing friends and family, among many other possibilities. Expanded voice and broadband service will increase these opportunities for the people of Missouri being served by WC in its respective RDOF Census Block Groups.

Moreover, Missouri consumers will particularly benefit from WC's designation as an ETC. WC is widely recognized as a premier provider of voice and broadband Internet offerings that relies on advanced systems, technologies, and infrastructure. WC provides voice and broadband Internet services to hundreds of thousands of residential customers in 18 states.

In addition, consumers will further benefit from WC's experience as a Lifeline service provider. WC and its affiliates have substantial experience in providing Lifeline services to low income consumers and communities. This will further facilitate WC's swift offering of needed services for qualifying low-income customers in the Census Block Groups.

VI. Conclusion and Request for Expedited Review

WC meets the requirements of both state and federal laws and regulations for designation as an ETC in the Census Block Groups listed in **Exhibit A**. Pursuant to 47 U.S.C. § 214(e), the Commission should designate WC as an ETC for the requested areas. By taking this action, the Commission will ensure that unserved consumers in the requested areas will have access to reliable voice and broadband service at rates equal to or less than what they are currently paying. Granting WC's request for ETC designation will benefit the public interest and increase competition.

WHEREFORE, for the reasons stated herein, WC respectfully requests that the Commission designate Windstream Communications, LLC as an ETC in the Census Block Groups listed in **Exhibit A** by no later than June 7, 2021 and order such other relief as may be appropriate.

- Signature Page Follows -

Date this 3rd day of May, 2021.

WINDSTREAM COMMUNICATIONS, LLC

Carol Keith
Deputy General Counsel
Missouri Bar # 45065
4001 North Rodney Parham Road
Little Rock, AR 72212
(847) 550-4433
Carol.Keith@windstream.com

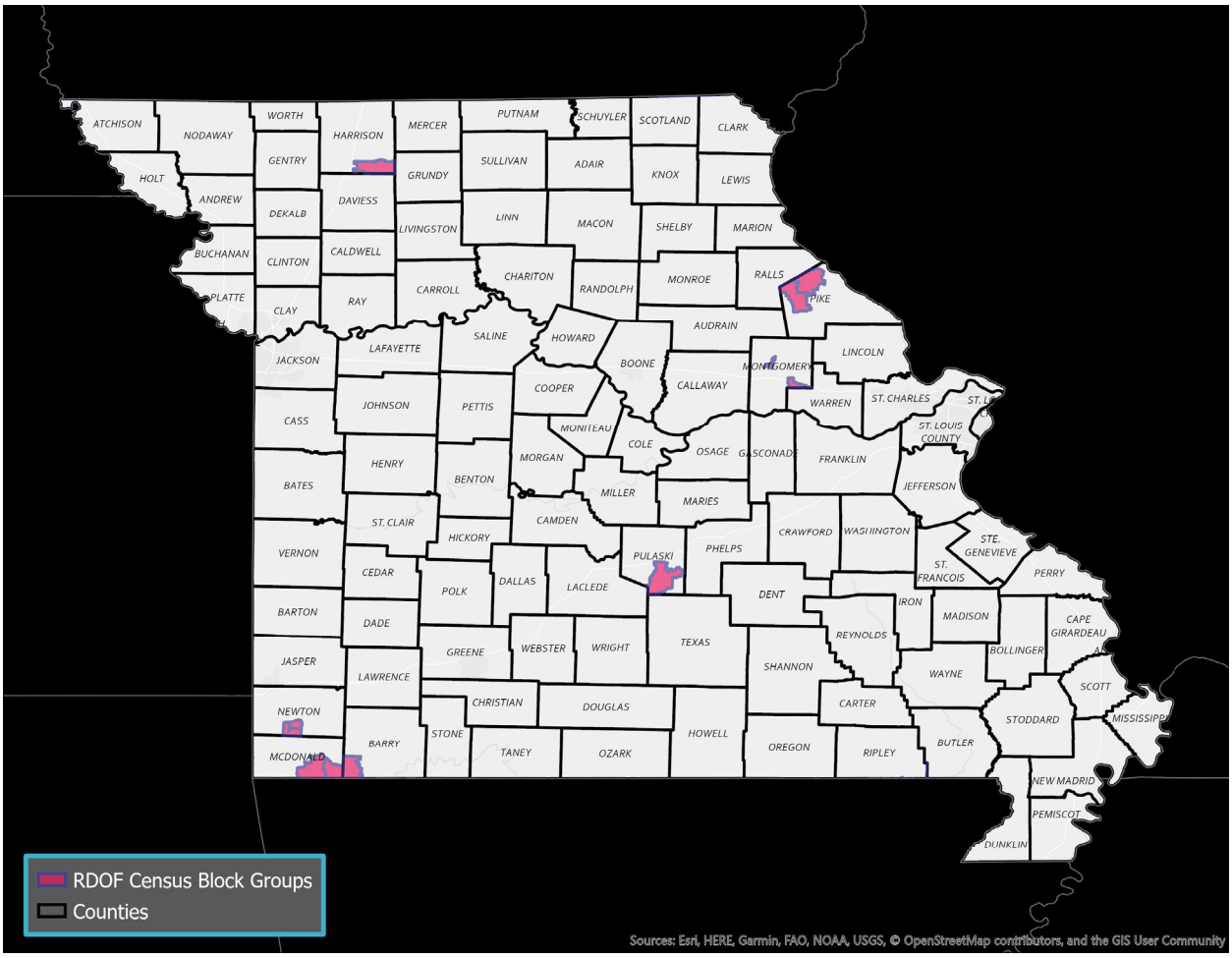
EXHIBIT A
CENSUS BLOCK GROUPS & MAP

Census Block ID	Census Block Group ID	County
290099604012114	290099604012	Barry County, MO
290099604012142	290099604012	Barry County, MO
290099604012149	290099604012	Barry County, MO
290099604012154	290099604012	Barry County, MO
290099604012156	290099604012	Barry County, MO
290099604012157	290099604012	Barry County, MO
290099604012158	290099604012	Barry County, MO
290099604012171	290099604012	Barry County, MO
290819501004163	290819501004	Harrison County, MO
291190701003031	291190701003	McDonald County, MO
291190701003034	291190701003	McDonald County, MO
291190701003038	291190701003	McDonald County, MO
291190701003080	291190701003	McDonald County, MO
291190701003082	291190701003	McDonald County, MO
291190701003083	291190701003	McDonald County, MO
291190701003084	291190701003	McDonald County, MO
291190701003085	291190701003	McDonald County, MO
291190701003088	291190701003	McDonald County, MO
291190701003089	291190701003	McDonald County, MO
291190701003091	291190701003	McDonald County, MO
291190701003094	291190701003	McDonald County, MO
291190701003096	291190701003	McDonald County, MO
291190701003098	291190701003	McDonald County, MO
291190701003099	291190701003	McDonald County, MO
291190701003100	291190701003	McDonald County, MO
291190701003102	291190701003	McDonald County, MO
291190701003103	291190701003	McDonald County, MO
291190701003105	291190701003	McDonald County, MO
291190701003108	291190701003	McDonald County, MO
291190701003110	291190701003	McDonald County, MO
291190701003111	291190701003	McDonald County, MO
291190701003112	291190701003	McDonald County, MO
291190701003113	291190701003	McDonald County, MO
291190701003114	291190701003	McDonald County, MO
291190701003115	291190701003	McDonald County, MO
291190701003116	291190701003	McDonald County, MO

Census Block ID	Census Block Group ID	County
291190701003118	291190701003	McDonald County, MO
291190701003120	291190701003	McDonald County, MO
291190701003121	291190701003	McDonald County, MO
291190701003123	291190701003	McDonald County, MO
291190701003127	291190701003	McDonald County, MO
291190701003129	291190701003	McDonald County, MO
291190701004111	291190701004	McDonald County, MO
291190701004134	291190701004	McDonald County, MO
291190701004136	291190701004	McDonald County, MO
291190701004141	291190701004	McDonald County, MO
291190701004143	291190701004	McDonald County, MO
291190701004145	291190701004	McDonald County, MO
291399702002103	291399702002	Montgomery County, MO
291399704003047	291399704003	Montgomery County, MO
291399704003085	291399704003	Montgomery County, MO
291399704003092	291399704003	Montgomery County, MO
291399704003097	291399704003	Montgomery County, MO
291399704003144	291399704003	Montgomery County, MO
291450208004159	291450208004	Newton County, MO
291450208004165	291450208004	Newton County, MO
291450208005136	291450208005	Newton County, MO
291450208005137	291450208005	Newton County, MO
291450208005226	291450208005	Newton County, MO
291450208005230	291450208005	Newton County, MO
291450208005232	291450208005	Newton County, MO
291634602002077	291634602002	Pike County, MO
291634602002085	291634602002	Pike County, MO
291634602002100	291634602002	Pike County, MO
291634602002103	291634602002	Pike County, MO
291634602002105	291634602002	Pike County, MO
291634602002106	291634602002	Pike County, MO
291634602002107	291634602002	Pike County, MO
291634602002108	291634602002	Pike County, MO
291634602002124	291634602002	Pike County, MO
291634602002125	291634602002	Pike County, MO
291634602002126	291634602002	Pike County, MO
291634602002127	291634602002	Pike County, MO
291634602002128	291634602002	Pike County, MO
291634602002129	291634602002	Pike County, MO

Census Block ID	Census Block Group ID	County
291634602002130	291634602002	Pike County, MO
291634602002131	291634602002	Pike County, MO
291634602002132	291634602002	Pike County, MO
291634602002133	291634602002	Pike County, MO
291634602002136	291634602002	Pike County, MO
291634602002137	291634602002	Pike County, MO
291634602002138	291634602002	Pike County, MO
291634602002139	291634602002	Pike County, MO
291634602002140	291634602002	Pike County, MO
291634602002141	291634602002	Pike County, MO
291634602002142	291634602002	Pike County, MO
291634602002144	291634602002	Pike County, MO
291634602002145	291634602002	Pike County, MO
291634602002146	291634602002	Pike County, MO
291634602002147	291634602002	Pike County, MO
291634602002149	291634602002	Pike County, MO
291634602002150	291634602002	Pike County, MO
291634602002151	291634602002	Pike County, MO
291634602002152	291634602002	Pike County, MO
291634602002192	291634602002	Pike County, MO
291634602002229	291634602002	Pike County, MO
291634603004139	291634603004	Pike County, MO
291634603004140	291634603004	Pike County, MO
291634603004141	291634603004	Pike County, MO
291634603004148	291634603004	Pike County, MO
291694706001009	291694706001	Pulaski County, MO
291694706001010	291694706001	Pulaski County, MO
291694706001016	291694706001	Pulaski County, MO
291694706001029	291694706001	Pulaski County, MO
291694706001058	291694706001	Pulaski County, MO
291694706001065	291694706001	Pulaski County, MO
291694706001130	291694706001	Pulaski County, MO
291694706001135	291694706001	Pulaski County, MO
291694706001138	291694706001	Pulaski County, MO
291694706001172	291694706001	Pulaski County, MO
291694706001263	291694706001	Pulaski County, MO
291694706001529	291694706001	Pulaski County, MO
291694706001583	291694706001	Pulaski County, MO
291694706001584	291694706001	Pulaski County, MO

Census Block ID	**Census Block Group ID**	**County**
291694706001587	291694706001	Pulaski County, MO
291694706001655	291694706001	Pulaski County, MO
291818702003057	291818702003	Ripley County, MO
291818702003058	291818702003	Ripley County, MO
291818702003059	291818702003	Ripley County, MO
291818702003063	291818702003	Ripley County, MO
291818704003077	291818704003	Ripley County, MO
291818704003081	291818704003	Ripley County, MO


ATCHISON
NODAWAY
WORTH
HARRISON
MERCER
PUTNAM
SCHUYLER
SCOTLAND
CLARK
HOLT
GENTRY
GRUNDY
SULLIVAN
ADAIR
KNOX
LEWIS
ANDREW
DEKALB
DAVIESS
LIVINGSTON
LINN
MACON
SHELBY
MARION
BUCHANAN
CLINTON
CALDWELL
CHARITON
RALLS
PIKE
PLATTE
CLAY
RAY
CARROLL
RANDOLPH
MONROE
AUDRAIN
SALINE
HOWARD
LAFAYETTE
JACKSON
BOONE
LINCOLN
MONTGOMERY
COOPER
CALLAWAY
WARREN
ST. CHARLES
JOHNSON
PETTIS
CASS
MONITEAU
COLE
OSAGE
GASCONADE
FRANKLIN
ST. LOUIS COUNTY
HENRY
MORGAN
BENTON
BATES
MILLER
MARIES
JEFFERSON
ST. CLAIR
CAMDEN
HICKORY
CRAWFORD
WASHINGTON
STE. GENEVIEVE
VERNON
PULASKI
PHELPS
ST. FRANCOIS
PERRY
CEDAR
POLK
DALLAS
LACLEDE
DENT
IRON
MADISON
BARTON
DADE
REYNOLDS
CAPE GIRARDEAU
GREENE
WEBSTER
WRIGHT
TEXAS
SHANNON
BOLLINGER
JASPER
LAWRENCE
WAYNE
SCOTT
CHRISTIAN
DOUGLAS
CARTER
NEWTON
STONE
HOWELL
STODDARD
MISSISSIPPI
BARRY
OREGON
BUTLER
MCDONALD
TANEY
OZARK
RIPLEY
NEW MADRID
PEMISCOT
DUNKLIN
RDOF Census Block Groups
Counties
Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

AFFIDAVIT

I, Jeff Small, a natural person, do hereby swear and affirm that I am an authorized agent of Windstream Services, LLC, which is the ultimate parent company of Windstream Communications, LLC, and that the information and statements contained in this application are true and correct to the best of my knowledge and belief.

By signing this form, I hereby certify that neither I, nor any other members of this filing party, has had communications with a Commissioner, Commissioner Advisor, Regulatory Law Judge, member of the General Counsel or any member of their support team in the sixty (60) days prior to the filing date of this application regarding any substantive issue included in this filing. If any communication of this sort has occurred in the previous sixty (60) day period, I further certify this application was held until sixty (60) days have passed from the date of the subject communication, or we have requested a waiver for good cause as allowed by Commission Rule 20 CSR 4240-4.017(1)(D).

Jeff Small
President - Kinetic

State of Arkansas §
§
County of Pulaski §

Subscribed and sworn before me this 16th day of April, 2021.

Leslie Lovett
Notary Public

My Commission Expires: 1/17/2024

[SEAL]

LESLIE LOVETT
MY COMMISSION # 12397077
EXPIRES: January 17, 2024
Pulaski County

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 3rd day of May, 2021.

Morris L. Woodruff
Secretary

Digitally signed by MOPSC
DN: CN=MOPSC, O=MOPSC, OU="", E=kim.happy@psc.mo.gov, C=US
Reason: I attest to the accuracy and integrity of this document
Location: Cole County, Missouri
Date: 2021.05.03 11:28:22-05'00'
Foxit PhantomPDF Version: 10.1.1

MISSOURI PUBLIC SERVICE COMMISSION

May 3, 2021

File/Case No. TA-2021-0354

Missouri Public Service Commission
Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounselservice@psc.mo.gov

Office of the Public Counsel
Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

Missouri Public Service Commission
Whitney Payne
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
whitney.payne@psc.mo.gov

Windstream Communications, LLC
Carol Keith
4001 Rodney Parham Rd
Little Rock, AR 72212
carol.keith@windstream.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

Morris L. Woodruff
Secretary

Distributed to all Local Exchange Carriers Certificated to Provide Service in Missouri.

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.