In the Matter of	)	
	)	
Bloosurf, LLC	)	WC Docket 09-197
	)	
Petition for Designation as an	)	
Eligible Telecommunications Carrier	)	
Pursuant to Section 214(e)(6) of the	)	
Communications Act of 1934, as amended	)	

To: The Commission

PETITION FOR ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION

Pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended ("Act"), and

Section 54.292 of the rules of the Federal Communications Commission ("Commission"),

Bloosurf LLC ("Bloosurf") respectively requests designation as an eligible telecommunications

carrier ("ETC") for a service area containing 225 census blocks (1,321 locations) in the State of

Delaware and 1,048 census blocks (3,770 locations) in the State of Maryland[1]. Bloosurf is

obligated to obtain ETC designation status within 180 days of the Phase II Auction Closing

Public Notice[2], and therefore requests expeditious action that it may meet this requirement.

I. INTRODUCTION AND SUMMARY

On August 28, 2018, the Commission announced the winning bidders for the Connect

America Fund ("CAF") Phase II auction ("Auction 903").[3] Bloosurf was announced as a

winning bidder for a total of 1,321 locations in the State of Delaware and 3,770 locations in the

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[1] A list of the census blocks is attached as Exhibit A.
[2] See 47 CFR § 54.315(b)(5).
[3] Public Notice, *Connect America Fund Phase II (Auction 903) Closes, Winning Bidders Announced, FCC Form 683 Due October 15, 2018, DA 18-887 (released August 28, 2018) (Phase II Auction Closing Public Notice")*.

State of Maryland with a total support amount of $5,468,497. Bloosurf has filed a long-form application for the census blocks listed in Exhibit A.

Bloosurf is a next-generation, facilities-based communications company based in Salisbury, Maryland[4]. The company serves residential and business customers in rural and remote areas of Delaware, Maryland, and Virginia using a combination of wired fiber optic and wireless spectrum for 4G transport and access facilities. With its designated CAF support, Bloosurf will expand its network in Maryland and Delaware through the construction and operation of a high-speed, high capacity wireless and wireline network to provide voice and high-speed Internet access services to the designated areas.

Bloosurf has offered broadband Internet access service to the public for since February 2010 and it serves over 1,000 non-Lifeline customers.

As discussed in more detail below, the Commission has the authority to grant Bloosurf's petition for ETC designation pursuant to Section 214(e)(6) of the Act, and Bloosurf meets all of the statutory and regulatory requirements for ETC designation.

II.   **THE COMMISSION HAS AUTHORITY TO GRANT THE ETC DESIGNATION REQUESTED BY BLOOSURF.**

Pursuant to Section 214(e)(6) of the Act, the Commission may designate an ETC where the applicant "is not subject to the jurisdiction of a State commission"[5] In the July 2018 *ETC Process Public Notice*, the Wireline Competition Bureau advised Phase II auction applicants that "If a state law expressly articulates that it does not have jurisdiction over a relevant type of technology, Commission staff would consider such a statute relevant in its determination of

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[4] Bloosurf, LLC is a limited liability company organized under the laws of Delaware.
[5] 47 U.S.C. §214(e)(6)

Commission jurisdiction."[6] Both Delaware and Maryland have expressly declined jurisdiction over interconnected voice over internet protocol.

Section 202(i)(1) of the Delaware Code states: "Notwithstanding any other provision of law to the contrary, the Commission shall have no jurisdiction or regulatory authority over Voice over Internet Protocol ("VoIP") service, as defined in paragraph (i)(2) of this section, or IP-enabled service, as defined in paragraph (i)(3) of this section, including but not limited to, the imposition of regulatory fees, certification requirements, rates, terms or other conditions of service."[7] Similarly, Section 8-602(a) of the Code of Maryland states: "The Commission does not have jurisdiction over the regulation of VoIP service including the imposition of regulatory fees, certification requirements, and the approval of tariffs."[8]

Given the requirement that Bloosurf obtain ETC status within 180 days of the *Phase II Auction Closing Public Notice*, Bloosurf urges to act expeditiously on this request for ETC designation.

III.   **BLOOSURF MEETS THE STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS AN ETC.**

As demonstrated herein, Bloosurf satisfies each of the statutory and regulatory requirements set forth in the Act and the Commission's rules.

A.   **Bloosurf Will Provide Service as a Common Carrier**

In the areas where Bloosurf receives ETC designation, Bloosurf will provide interconnected Voice over Internet Protocol ("VoIP") service in the designated census blocks on

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[6] Public Notice, *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Dockets No. 09-197, 10-90, DA 18-714 (released July 10, 2018) *("ETC" Process Public Notice*"), at 2; *see also Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al., 29 FCC Rcd 7051, 7112, para. 183 (2014).
[7] Delaware Code Ann. Title 26, Public Utilities §202(i)(1)
[8] Code of Maryland, Article – Public Utilities, § 8-602(b).

a common carrier basis. As such, with respect to the interconnected VoIP services it plans to
deploy in the designated census blocks, Bloosurf is a common carrier under 214(e)(1) and
214(e)(6) of the Act[9].

B. <u>Bloosurf Will Offer the Services Supported by the Federal Universal Service</u>
<u>Support Mechanisms</u>

For CAF Phase II support recipients, the Commission defines the supported service as
qualifying voice service and conditions grant of funding on the offering of qualifying broadband
service.[10] As described below, Bloosurf certifies that it will provide the following services that
are supported by the federal universal service support mechanisms.[11]

1. *Voice Grade Access to the PSTN* – Bloosurf will offer interconnected VoIP
   service on a standalone basis. Service shall be provided through resale
   agreements with one or more service providers who have interconnection
   agreements that enable service to the Bloosurf designated service areas.[12] At this
   time, Inteliquent is the only provider of wholesale interconnected VoIP in
   Maryland and Delaware for inbound and outbound voice telephony services
   whom Bloosurf is currently considering. Bloosurf will be legally responsible for
   dealing with customer problems, providing quality of service guarantees, and
   meeting the Commission's universal service requirements.

   Voice telephony as a standalone service throughout the designated service area
   will be offered at rates that are reasonably comparable to, or less than, urban rates

   This service will include a flat monthly recurring rate for local service with
   minutes of use for local service at no additional charge to end users. Options for
   domestic long-distance shall include options for buckets of minutes of use for toll
   calls within the lower 48 states at a flat rate for each bucket of minutes of use. All
   local plans will include access to emergency services via 911 or E-911. In
   accordance with the elimination of dialing parity, Bloosurf will not enable
   customers to choose other carriers for their long-distance requirements; for direct

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[9] *See* Exhibit B (Affidavit of Vincent Sabathier, CTO, Bloosurf, LLC) ("Sabathier Affidavit")
[10] *See* 47 CFR § 54.101 (including, both eligible voice telephony and eligible broadband internet access as services
"supported by federal universal service support mechanisms," and characterizing the provision of eligible
broadband service as a high-cost public interest obligation); *see also Connect America Fund et al*, Report and Order
and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, 17692-94, 17695, paras. 77-83, 86 (2011), *aff'd sub
nom. In re: FCC 11-161, 753, F3d 1015* (10th Cir. 2014) (defining "voice telephony service" as the supported service
and requiring Connect America Fund support recipients to offer broadband as a condition of receiving support).
[11] See Exhibit B (Sabathier Affidavit).
[12] See 47 U.S.C. §214(e)(1)(A)

1+ dialing.[13] International and other locations beyond the "lower 48" state destinations will be charged on a per minute of use basis. Qualifying lifeline customers may choose Toll Limitation services with their lifeline service.[14] Directory assistance will be provided.

2. *Broadband Internet Access Services* – Bloosurf's broadband Internet offering includes 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 enabling the operation of the data and other communications services that the high-speed broadband connection supports. Speeds from 1Mbps to 1Gbps are supported based on the service location and the available transport media. Such service shall not include dial-up service.

    Broadband performance obligations shall exceed or comply with the similar reasonable comparability rate certification requirement adopted by the Commission.[15]

    Bloosurf commits to provide these services consistent with the Commission's high-cost universal service support rules applicable to it.[16]

In addition, Bloosurf will offer Lifeline discounts to qualifying low-income consumers consistent with the Commission's Lifeline rules in the census blocks where Bloosurf is authorized to receive CAF Phase II support.[17] For Maryland Lifeline, which the Maryland PSC shall designate, Bloosurf shall comply with Commission Lifeline rules and Maryland PSC Lifeline rules in the census blocks in Maryland where Bloosurf is authorized to receive CAF Phase II support.

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[13] Report and Order, *Forbearance from Interexchange Dialing Parity*, WC Docket 17-244, 13-97, FCC 18095 (Rel. July 13, 2018), Section 18. *Elimination of Dialing Parity Rule 251(b)(3).*

[14] 47 CFR § 54.101(1)(2).

[15] *Connect America Fund et al., WC Docket No. 10-90 et al., Report and Order, 29 FCC Rcd 15644, 15686-87, para. 120 (2014) (December 2014 CAF Order).*

[16] *See* 47 CFR § 54.101(c), 54.309.

[17] *See id*. § 54.101(d); Lifeline and Link Up Reform and Modernization, et al. Third Report and Order Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 3974, 4074-75, paras. 35, 311-12 (2016) (requiring all high-cost recipients to meet Lifeline Obligations in all areas where they deploy a network pursuant to a broadband service obligation and are commercially offering qualifying service).

Bloosurf possesses the financial and technical capability to provide the supported services. Bloosurf incorporates by reference the information and certifications that it is making in its FCC Form 683 long form application CAF Phase II support.[18]

Bloosurf certifies that it will comply with the service and performance quality requirements for CAF Phase II support. It incorporates by reference the information and certifications that it is making in its FCC Form 683 application for Phase II support.[19]

Bloosurf further certifies that its wireless and fiber optic networks have the ability to remain functional in emergency situations. Bloosurf can provide back-up power to ensure functionality without an external power source, has the ability to reroute traffic around damaged facilities, and it will be capable of managing traffic spikes resulting from emergency situations using common network engineering best practices for our broadband transport and voice networks. Bloosurf's wireless and fiber optic network facilities will support telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including 911 services.

C. **Bloosurf Will Provide Service Using a Combination of its Own Facilities and Resale of Another Carrier's Services**

Bloosurf will be a facilities-based provider of broadband Internet access and interconnected VoIP services. Bloosurf is in the process of expanding its wireless and fiber optic networks through owned and leased network transport where they have the exclusive use of the facilities or bandwidth.[20] Bloosurf shall "offer the services that are supported by Federal universal service support mechanisms under section 254(c); either using its own facilities or a

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[18] *ETC Process Public Notice* at 5.
[19] *See* 47 CFR § 54.309
[20] *See ETC Public Notice at* 3 ("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.")

combination of its own facilities and resale of another carrier's services."[21] Inbound and outbound services with long-distance, directory service, and 911 routing from Inteliquent, Inc, formerly Neutral Tandem, is the third-party option that Bloosurf has selected for VoIP resale. On an ongoing basis, Bloosurf will complete reviews of the quality of the voice services to continually qualify their VoIP resale arrangement carrier partner.

D. **Continuity of 911 Communications for Fixed, Non-Line-Powered Facilities-Based, for Voice Residential Service, Including Fixed Wireless Service Intended as POTS Replacement.**

As a provider of a services that include fixed wireless services that are intended as a replacement for traditional POTS ("Plain Old Telephone Service"), Bloosurf shall comply with the requirements to ensure continuity of 911 communications. At the subscriber's option and expense, Bloosurf shall offer a backup power solution that provides 911 access in the event of commercial power loss. At least one option shall provide a minimum of 24 hours of access to 911 service. Additionally, Bloosurf shall provide explanations at the point of sale about how the subscriber may extend the provision of backup power during longer, multi-day outages through devices such as solar chargers, car chargers or mobile charging stations and to direct customers to sources of such equipment. No subscriber will be forced to purchase unwanted equipment. Only subscribers who so elect can obtain backup power simply and conveniently from Bloosurf when activating a covered service. In addition, in order to ensure that consumers are adequately informed in determining whether to make this election, Bloosurf shall include disclosure requirements designed to ensure that subscribers are aware of the backup power options available for their service, including installation and other usage instructions. While it is not

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[21] 47 U.S.C. § 214(e)(1)(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)")

required, Bloosurf shall engage with state and local disaster preparedness entities to develop and conduct tailored outreach to state and local disaster preparedness entities to ensure that consumables associated with their backup power technical solutions are well understood so that the communities may prioritize restocking and/or recharging in support of extended power outages.[22]

E. __Bloosurf Will Provide Service Throughout Its Designated Service Area__

Bloosurf commits to providing the supported services throughout its ETC designated service area, consistent with all applicable requirements. Bloosurf requested Commission ETC designated service area is limited to the census blocks identified in Exhibit A.

F. __Bloosurf Will Advertise the Availability of its Service and Charges Using Media of General Distribution.__

Bloosurf will advertise the availability of, and the 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.[23] Bloosurf will offer and advertise its voice and broadband services through direct mailing and is considering advertisements though other media such as radio, newspapers, and booths at community events.

IV. ANTI-DRUG ABUSE CERTIFICATION

Bloosurf certifies that neither the petitioner nor any party to the petition is subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, as implemented in Section 1.2002 of the Commission's rules.[24]

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[22] *See* Report and Order, *Ensuring Continuity of 911 Communications*, PS Docket 14-174, FCC 15-98 (rel. August 7, 2015), at para 18.
[23] 47 U.S.C. § 214(e)(1)(B) ("Advertise the availability of such services and the charges therefore using media of general distribution.")
[24] 47 CFR § 1.2002; see Exhibit B (Sabathier Affidavit).

V. CONCLUSION

For all of the foregoing reasons, Bloosurf respectively requests that the Commission designate it as an ETC so that Bloosurf will be eligible for CAF Phase II Support in the Delaware and Maryland census blocks listed in Exhibit A.

<div align="right">
Respectfully submitted,

Bloosurf, LLC
</div>

By: /s/ James E. Cook
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January 2, 2019

EXHIBIT A

**LIST OF CENSUS BLOCKS IN WHICH BLOOSURF SEEKS
ELIGIBLE TELECOMMUNICAITONS CARRIER DESIGNATION**

Census Block Group	FCC Item	County	Census Block
100050503011	DE-005-0503011	Sussex	100050503011000
	DE-005-0503011	Sussex	100050503011001
	DE-005-0503011	Sussex	100050503011003
	DE-005-0503011	Sussex	100050503011005
	DE-005-0503011	Sussex	100050503011007
	DE-005-0503011	Sussex	100050503011010
	DE-005-0503011	Sussex	100050503011012
	DE-005-0503011	Sussex	100050503011013
	DE-005-0503011	Sussex	100050503011014
	DE-005-0503011	Sussex	100050503011026
	DE-005-0503011	Sussex	100050503011031
	DE-005-0503011	Sussex	100050503011033
	DE-005-0503011	Sussex	100050503011039
	DE-005-0503011	Sussex	100050503011041
	DE-005-0503011	Sussex	100050503011042
	DE-005-0503011	Sussex	100050503011043
	DE-005-0503011	Sussex	100050503011057
	DE-005-0503011	Sussex	100050503011069
	DE-005-0503011	Sussex	100050503011071
	DE-005-0503011	Sussex	100050503011073
	DE-005-0503011	Sussex	100050503011075
	DE-005-0503011	Sussex	100050503011078
	DE-005-0503011	Sussex	100050503011093
	DE-005-0503011	Sussex	100050503011094
	DE-005-0503011	Sussex	100050503011095
	DE-005-0503011	Sussex	100050503011097
100050503013	DE-005-0503013	Sussex	100050503013006
	DE-005-0503013	Sussex	100050503013007
	DE-005-0503013	Sussex	100050503013046
	DE-005-0503013	Sussex	100050503013094
	DE-005-0503013	Sussex	100050503013117
100050503022	DE-005-0503022	Sussex	100050503022005
	DE-005-0503022	Sussex	100050503022006
	DE-005-0503022	Sussex	100050503022008

	DE-005-0503022	Sussex	100050503022009
	DE-005-0503022	Sussex	100050503022012
	DE-005-0503022	Sussex	100050503022013
	DE-005-0503022	Sussex	100050503022017
100050504011	DE-005-0504011	Sussex	100050504011006
	DE-005-0504011	Sussex	100050504011007
	DE-005-0504011	Sussex	100050504011010
	DE-005-0504011	Sussex	100050504011018
	DE-005-0504011	Sussex	100050504011026
	DE-005-0504011	Sussex	100050504011028
	DE-005-0504011	Sussex	100050504011033
	DE-005-0504011	Sussex	100050504011035
	DE-005-0504011	Sussex	100050504011040
	DE-005-0504011	Sussex	100050504011041
	DE-005-0504011	Sussex	100050504011056
	DE-005-0504011	Sussex	100050504011058
	DE-005-0504011	Sussex	100050504011067
	DE-005-0504011	Sussex	100050504011068
100050504012	DE-005-0504012	Sussex	100050504012003
	DE-005-0504012	Sussex	100050504012025
	DE-005-0504012	Sussex	100050504012057
	DE-005-0504012	Sussex	100050504012072
100050504031	DE-005-0504031	Sussex	100050504031054
	DE-005-0504031	Sussex	100050504031076
100050504071	DE-005-0504071	Sussex	100050504071004
	DE-005-0504071	Sussex	100050504071025
100050504081	DE-005-0504081	Sussex	100050504081000
100050513021	DE-005-0513021	Sussex	100050513021033
	DE-005-0513021	Sussex	100050513021037
	DE-005-0513021	Sussex	100050513021049
	DE-005-0513021	Sussex	100050513021060
	DE-005-0513021	Sussex	100050513021071
	DE-005-0513021	Sussex	100050513021072
	DE-005-0513021	Sussex	100050513021074
100050513022	DE-005-0513022	Sussex	100050513022017
	DE-005-0513022	Sussex	100050513022018
100050513053	DE-005-0513053	Sussex	100050513053021
	DE-005-0513053	Sussex	100050513053044

	DE-005-0513053	Sussex	100050513053045
100050513061	DE-005-0513061	Sussex	100050513061027
100050514001	DE-005-0514001	Sussex	100050514001008
	DE-005-0514001	Sussex	100050514001033
	DE-005-0514001	Sussex	100050514001039
	DE-005-0514001	Sussex	100050514001042
	DE-005-0514001	Sussex	100050514001063
100050514002	DE-005-0514002	Sussex	100050514002016
	DE-005-0514002	Sussex	100050514002017
	DE-005-0514002	Sussex	100050514002021
100050515004	DE-005-0515004	Sussex	100050515004012
	DE-005-0515004	Sussex	100050515004013
	DE-005-0515004	Sussex	100050515004014
	DE-005-0515004	Sussex	100050515004015
	DE-005-0515004	Sussex	100050515004016
	DE-005-0515004	Sussex	100050515004018
	DE-005-0515004	Sussex	100050515004020
	DE-005-0515004	Sussex	100050515004045
	DE-005-0515004	Sussex	100050515004050
	DE-005-0515004	Sussex	100050515004053
	DE-005-0515004	Sussex	100050515004054
	DE-005-0515004	Sussex	100050515004055
	DE-005-0515004	Sussex	100050515004056
	DE-005-0515004	Sussex	100050515004057
	DE-005-0515004	Sussex	100050515004060
	DE-005-0515004	Sussex	100050515004064
100050517011	DE-005-0517011	Sussex	100050517011010
	DE-005-0517011	Sussex	100050517011012
	DE-005-0517011	Sussex	100050517011013
	DE-005-0517011	Sussex	100050517011015
	DE-005-0517011	Sussex	100050517011022
	DE-005-0517011	Sussex	100050517011025
	DE-005-0517011	Sussex	100050517011033
	DE-005-0517011	Sussex	100050517011034
	DE-005-0517011	Sussex	100050517011037
	DE-005-0517011	Sussex	100050517011038
	DE-005-0517011	Sussex	100050517011041
	DE-005-0517011	Sussex	100050517011045
100050517012	DE-005-0517012	Sussex	100050517012000

	DE-005-0517012	Sussex	100050517012002
	DE-005-0517012	Sussex	100050517012003
	DE-005-0517012	Sussex	100050517012004
	DE-005-0517012	Sussex	100050517012005
	DE-005-0517012	Sussex	100050517012009
	DE-005-0517012	Sussex	100050517012010
	DE-005-0517012	Sussex	100050517012012
	DE-005-0517012	Sussex	100050517012029
	DE-005-0517012	Sussex	100050517012032
	DE-005-0517012	Sussex	100050517012050
	DE-005-0517012	Sussex	100050517012057
	DE-005-0517012	Sussex	100050517012087
	DE-005-0517012	Sussex	100050517012091
100050517021	DE-005-0517021	Sussex	100050517021003
	DE-005-0517021	Sussex	100050517021004
	DE-005-0517021	Sussex	100050517021007
	DE-005-0517021	Sussex	100050517021008
	DE-005-0517021	Sussex	100050517021009
	DE-005-0517021	Sussex	100050517021014
	DE-005-0517021	Sussex	100050517021016
	DE-005-0517021	Sussex	100050517021019
	DE-005-0517021	Sussex	100050517021024
	DE-005-0517021	Sussex	100050517021037
	DE-005-0517021	Sussex	100050517021038
	DE-005-0517021	Sussex	100050517021040
	DE-005-0517021	Sussex	100050517021042
	DE-005-0517021	Sussex	100050517021045
	DE-005-0517021	Sussex	100050517021048
	DE-005-0517021	Sussex	100050517021049
	DE-005-0517021	Sussex	100050517021050
	DE-005-0517021	Sussex	100050517021051
	DE-005-0517021	Sussex	100050517021052
	DE-005-0517021	Sussex	100050517021054
	DE-005-0517021	Sussex	100050517021055
	DE-005-0517021	Sussex	100050517021056
	DE-005-0517021	Sussex	100050517021057
	DE-005-0517021	Sussex	100050517021060
	DE-005-0517021	Sussex	100050517021066
	DE-005-0517021	Sussex	100050517021067
	DE-005-0517021	Sussex	100050517021069

	DE-005-0517021	Sussex	100050517021070
	DE-005-0517021	Sussex	100050517021071
	DE-005-0517021	Sussex	100050517021072
	DE-005-0517021	Sussex	100050517021073
	DE-005-0517021	Sussex	100050517021075
	DE-005-0517021	Sussex	100050517021077
	DE-005-0517021	Sussex	100050517021089
	DE-005-0517021	Sussex	100050517021091
	DE-005-0517021	Sussex	100050517021092
	DE-005-0517021	Sussex	100050517021096
	DE-005-0517021	Sussex	100050517021097
	DE-005-0517021	Sussex	100050517021098
	DE-005-0517021	Sussex	100050517021104
	DE-005-0517021	Sussex	100050517021106
	DE-005-0517021	Sussex	100050517021107
	DE-005-0517021	Sussex	100050517021109
	DE-005-0517021	Sussex	100050517021110
	DE-005-0517021	Sussex	100050517021112
100050517022	DE-005-0517022	Sussex	100050517022000
	DE-005-0517022	Sussex	100050517022001
	DE-005-0517022	Sussex	100050517022004
	DE-005-0517022	Sussex	100050517022059
100050517023	DE-005-0517023	Sussex	100050517023015
	DE-005-0517023	Sussex	100050517023020
	DE-005-0517023	Sussex	100050517023041
	DE-005-0517023	Sussex	100050517023049
	DE-005-0517023	Sussex	100050517023050
	DE-005-0517023	Sussex	100050517023051
	DE-005-0517023	Sussex	100050517023052
	DE-005-0517023	Sussex	100050517023054
	DE-005-0517023	Sussex	100050517023057
	DE-005-0517023	Sussex	100050517023061
	DE-005-0517023	Sussex	100050517023063
	DE-005-0517023	Sussex	100050517023066
	DE-005-0517023	Sussex	100050517023067
	DE-005-0517023	Sussex	100050517023068
	DE-005-0517023	Sussex	100050517023069
	DE-005-0517023	Sussex	100050517023070
	DE-005-0517023	Sussex	100050517023089
	DE-005-0517023	Sussex	100050517023090

	DE-005-0517023	Sussex	100050517023092
	DE-005-0517023	Sussex	100050517023095
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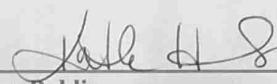|	MD-047-9514003	Worcester	240479514003204
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EXHIBIT B

AFFIDAVIT OF VINCENT SABATHIER
PRESIDENT AND CHIEF TECHNOLOGY OFFICER OF BLOOSURF, LLC

Vincent Sabathier, after being duly sworn, states the following:

1. I have personal knowledge of the facts and information set forth in this Affidavit and I am competent to testify to these facts if called as a witness.

2. I am President and Chief Technology Officer of Bloosurf, LLC ("Bloosurf"). Acting on behalf of Bloosurf, I have read the Petition to which this Affidavit is attached. I have knowledge of the facts stated in the Petition and those facts are true to the best of my knowledge and belief.

3. Bloosurf certifies that it is a common carrier under sections 214(e)(1) and 214 (e)(6) of the Communications Act of 1934, as amended ("Act").

4. Bloosurf commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier in the Census Blocks described in the Petition.

5. Bloosurf certifies that it will meet all of the Commission's requirements for designation as an ETC under Section 214(e)(6) of the Act.

6. I am the corporate officer that will be responsible for certifying Bloosurf's use of federal high-cost support.

7. Bloosurf will use the federal high-cost support that it receives only to provide, construct, upgrade, and maintain the facilities and services for which the support is intended.

8. Bloosurf certifies that neither it nor any party to its application is subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, as implemented in Section 1.2002 of the Commission's rules.
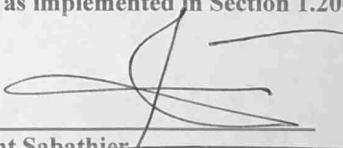
Vincent Sabathier
President and Chief Technology Officer
Bloosurf, LLC

Subscribed and Sworn to before me this
2nd day of January 2019

Notary Public
My Commission Expires: 11/30/2021

KATHE HORNECKER
NOTARY PUBLIC
REG. #7727332
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES NOVEMBER 30, 2021

44