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Ron Comingdeer
Kendall Parrish

VIA ECFS

February 15, 2019

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Redwire, Inc., Petition for Designation as an Eligible Telecommunications Carrier,
Pursuant to Section 214(e)(6) of the Act, Docket No. 09-197

Dear Ms. Dortch:

Please accept for filing the attached Petition of Redwire, Inc. ("Redwire"), a tribal entity owned by the Otoe-Missouria Development Authority, for Eligible Telecommunications Carrier ("ETC") status in its service area within the federally recognized Otoe-Missouria Tribal trust lands, including the Census Block Groups for which it had winning bids in the Connect America Fund Phase II Auction 903, as announced on August 28, 2018. As discussed more fully in its Petition, Redwire is a Tribally owned telecommunications provider, and will offer supported services within the Otoe-Missouria Tribal lands. Accordingly, no state public utility commission has jurisdiction over the service area where Redwire is seeking designation as an ETC under this Petition, and therefore the Commission has jurisdiction over Redwire's Petition.

This Petition has been filed via ECFS in Docket 09-197. A Certificate of Service is also included with this filing.

Thank you for your assistance in this matter and please do not hesitate to contact me at (405) 848-5534 or kparrish@comingdeerlaw.com if you have any questions or concerns regarding this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Kendall Parrish', with a long horizontal flourish extending to the right.

Kendall Parrish
Counsel to Redwire, Inc.

cc: Nissa Laughner, Wireline Competition Bureau (via E-Mail)
Matthew Duchesne, Office of Native American Affairs and Policy (via E-Mail)

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Telecommunications Carriers Eligible to)	
Receive Universal Service Support)	WC Docket No. 09-197
)	
Petition of Redwire, Inc., for Designation)	
as an Eligible Telecommunications Carrier)	
Pursuant to Section 214(e)(6) of the Act.)	

PETITION OF REDWIRE, INC., FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER

1. Introduction and Background

Redwire, Inc. ("Redwire" or the "Company"), a winning bidder in the Connect America Fund Phase II auction,¹ pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended,² and Section 54.201(d) of the Commission's Rules,³ petitions the Federal Communications Commission ("Commission") for designation as an Eligible Telecommunications Carrier ("ETC") its proposed service area within the Tribal trust lands of the Otoe-Missouria Tribe of Oklahoma, a federally recognized Indian tribe whose headquarters are located in Red Rock, Oklahoma.

Redwire is an Oklahoma corporation and telecommunications and broadband provider owned by the Otoe-Missouria Development Authority. The Otoe-Missouria Development Authority (OMDA) is the official enterprise and economic development arm of the Otoe-Missouria Tribe of Indians of Oklahoma. The Otoe-Missouria Development Authority was created by the Otoe-Missouria Tribal Council in July of 2006 with the passage of the Amended and Restated Otoe-Missouria Development Act of 2006.

¹ On August 28, 2018, Redwire was named a winning bidder in Auction 903, the Commission's Connect America Fund Phase II Auction. *Connect America Fund Phase II Auction (Auction 903) Closes, Winning Bidders Announced, FCC Form 683 Due October 15, 2018*, Public Notice, Docket Nos. AU 17-182 and WC 10-90 (Rel. August 28, 2018) ("Auction 903 closing Public Notice").

² 47 U.S.C. § 214(e)(6) ("Section 214(e)(6)").

³ 47 CFR § 54.201(d).

One of the requirements of the Connect America Fund Phase II Program ("CAF Phase II") is that successful bidders must submit to the Commission proof of their ETC designation in all supported areas within 180 days of the Commission's August 28, 2018 announcement of winning bids.⁴ Because Redwire, a Tribally-owned provider, is seeking FCC ETC designation to serve Tribal lands within the federally-recognized Otoe-Missouria tribal lands, as discussed in this Petition, the Commission has jurisdiction of this petition.⁵ Redwire intends to provide services as an eligible telecommunications carrier within Redwire's service area within the Otoe-Missouria tribal lands (see attached Exhibit A).

As a winning bidder in the CAF Phase II Auction, Redwire intends to offer broadband and voice service offerings by deploying a wireless network to community anchor institutions, including education and government facilities, and to business and residential end users within the awarded Census Block Groups ("CBGs") within its service area within the Otoe-Missouria Tribal lands. This service area will target underserved areas within the Otoe-Missouria Tribal lands.

As a Tribally-owned entity, Redwire is subject to the regulatory authority and jurisdiction of the federally recognized Otoe-Missouria Tribe. At this time, the Otoe-Missouria Tribe, does not impose entry regulations for Redwire to operate as a telecommunications carrier and broadband provider within the Otoe-Missouria Tribal lands. Redwire will coordinate with the Tribal Council and is providing the Tribal Council with a copy of this Petition in accordance with Commission Rules.⁶ Redwire is not subject to the jurisdiction of the State of Oklahoma for that portion of its service area within the Otoe-Missouria Tribal lands, however it is serving a copy of

⁴ 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 Docket Nos. 09-197, 10-90 (July 10, 2018) ("CAF ETC Public Notice") at 1.

⁵ *Federal-State Joint Board on Universal Service; Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, Twelfth Report and Order, Memorandum Opinion and Order, and Notice of Proposed Rulemaking, 15 FCC Rcd 12208, 12261, 12665069 (2000) ("*Twelfth Report and Order*"); *CAF ETC Public Notice* at 2.

⁶ 47 C.F.R. § 54.202(c).

this petition upon the Oklahoma Corporation Commission in accordance with Commission requirements for ETC petitions on Tribal lands.⁷ Redwire requests that it be designated by the Commission as an eligible telecommunications carrier entitled to receive all available support from the federal Universal Service Fund ("USF"), including, but not limited to, support for service to rural, insular, and high-cost service areas, support to serve low-income customers, E-Rate support (schools and libraries), and those funds available under the Connect America Fund Phase II Reverse Auction ("Auction 903").⁸

Redwire will serve the public interest by providing qualifying access to high-speed Internet access and standalone voice telephony services, using its own facilities, to the Otoe-Missouria Tribal lands. The Otoe-Missouria Tribal lands, situated in northern Oklahoma, consists of predominantly rural terrain which is sparsely populated, and underserved by modern telecommunications infrastructure that is common elsewhere in the United States. Most areas of the Otoe-Missouri Tribal lands suffer from significant geographic, demographic and resource impediments to having reliable, affordable, competitive and ubiquitous telecommunications services. Very limited broadband service options currently exist within the Redwire service area. The Commission's own CAF Phase II data identify census block groups without minimum broadband services. Redwire intends to offer a more technologically advanced and reliable network to provide more robust services offerings than the limited or non-existent broadband offerings currently available from the incumbent carrier on the Otoe-Missouria tribal lands.

⁷ See, e.g. *CAF ETC Public Notice* at 10. Redwire also was the winning bidder in the CAF Phase II Auction in census blocks located outside the Otoe-Missouria Tribal lands. An Application seeking ETC designation in these non-Otoe-Missouria Tribal areas is pending before the Oklahoma Corporation Commission.

⁸ *Connect America Fund, et al.*, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Red 5949, 5986, para. 110 (2016) ("*Phase II Auction Order*").

Redwire will offer supported service to any requesting customer within its service area, including Lifeline service, and will bid on any request for service from eligible schools and libraries within Redwire's service area for supported services under the federal USF's E-Rate program.. Redwire respectfully requests that the Commission grant its Petition expeditiously designating it as an Eligible Telecommunications Carrier ("ETC") within the Tribal areas of the Otoe-Missouria tribal lands to enable the Company to receive federal Universal Service cost recovery support, including Connect America Fund Phase II support.⁹ In support of this Petition, the Company states the following:

II. Redwire Satisfies All of the Statutory and Regulatory Prerequisites for Designation as an ETC.

Redwire satisfies each of the elements required for ETC designation by the Commission pursuant to Section 214(e)(6).¹⁰ Redwire's proposed broadband wireless services will utilize state-of-the-art technology, offering up to 1 Gigabit, low-latency wireless broadband services to Otoe-Missouria residential and business customers rivaling or exceeding that available in many urban areas and the FCC's benchmark standard of 25 Mbps/3 Mbps for broadband services. These services will meet demand for high-quality telecommunications and broadband services in currently unserved or underserved areas of the Otoe-Missouria tribal lands. As the Commission has recognized, Tribal areas are among the most unserved areas for broadband services within the United States. The supported services are designed to meet all USF supported services, and Redwire satisfies all of the statutory and regulatory requirements for designation as an ETC.

⁹ Under the requirements of the Connect America Fund Phase II auction, winning bidders are required to obtain ETC designation within 180 days after the Public Notice announcing the winning bidders is released. Phase II Auction Order, 31 FCC 5949, 5999, para. 141 (2016).

¹⁰ *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, Public Notice 12 FCC Rcd. 22947 (1997) ("*Section 214(e)(6) Notice*").

A. Because Redwire is a Tribally-Owned Telecommunications Carrier regulated by the Otoe-Missouria Tribal Council, it is not subject to the jurisdiction of the Oklahoma Corporation Commission.

Non-tribally owned telecommunications carriers are typically subject to state commission jurisdiction, and states therefore are ordinarily responsible for designating eligible telecommunications carriers and service areas for such carriers. However, Section 214(e)(6) of The Communications Act establishes an important exception to the primary rule: in the case of a common carrier that is not subject to the jurisdiction of a State commission, such as a Tribally owned carrier, the Federal Communications Commission shall, upon request, designate such a common carrier that meets the requirements of Section 214(e)(1) as an eligible telecommunications carrier for a service area designated by the Commission.¹¹

In its Twelfth Report and Order, the Commission established a framework for the ETC designation process under Section 214(e)(6) for carriers serving Tribal lands.¹² The Commission specifically concluded that a carrier seeking ETC designation on Tribal lands may petition the Commission directly without seeking designation from the state commission. For the reasons stated below, it is clear that Redwire is not subject to the jurisdiction of the State of Oklahoma, nor, by extension, the Oklahoma Corporation Commission. Once it has determined that it has jurisdiction over this Petition, the FCC is tasked with evaluating the merits of the ETC Petition.

The Commission has recognized that the legislative history of Section 214(e)(6) confirms that Congress sought to ensure that Tribally-owned carriers serving Tribal lands were covered and protected by this provision. Additionally, the Commission has observed that the "determination of jurisdiction over a carrier serving tribal lands is an inquiry that will extend beyond questions of

¹¹ 47 U.S.C. § 214(e)(1).

¹² "[A] common carrier providing telephone exchange service and exchange access that is not subject to the jurisdiction of a State Commission" may apply directly to the Commission for ETC designation. *Twelfth Report and Order*, 15 FCC Rcd at 12265 (2000).

state law, and will be informed by principles of tribal sovereignty, federal law, and treaties.” Therefore, this Petition first discusses relevant Tribal law and Treaties.

First, as discussed above, the Otoe-Missouria Tribe has never consented to state jurisdiction and, as a federally recognized Tribe, has always recognized its inherent direct legal relationship with the United States as that of one nation to another nation. Accordingly, Redwire has requested ETC designation by the state commission only for those areas located outside the Otoe-Missouria Tribal lands. Second, federal treaties are the “supreme law of the land” of the U.S. federal government, as established by Article VI in the United States Constitution, a fact readily acknowledged by the Commission in the *Twelfth Report and Order*.¹³

Finally, the Commission’s own precedent is very clear regarding Tribally-owned carriers serving Tribal lands. Tribally-owned carriers serving Tribal lands are eligible to apply to the Commission for designation as an ETC. The FCC has made this decision in each case in which a Tribally-owned carrier has applied to the FCC to have its ETC application considered, such as Hopi Telecommunications, Fort Mojave Telecommunications, Gila River Telecommunications, San Carlos Telecommunications, Tohono O’ Odham Utility Authority, NTUA Wireless and Standing Rock Telecommunications.¹⁴ In each case, the Tribal carrier’s ETC Petition was approved.

¹³ “[T]he determination of jurisdiction over a carrier serving tribal lands . . . will be informed by principles of tribal sovereignty, federal law and treaties.” *Twelfth Report and Order*, 15 FCC Rcd at 12265.

¹⁴ In the Matter of Telecommunications Carriers Eligible for Universal Serv. Support Standing Rock Telecommunications, Inc. Petition for Designation As an Eligible Telecommunications Carrier Petition of Standing Rock Telecommunications, Inc. to Redefine Rural Serv. Areas, Memorandum Opinion and Order on Reconsideration, 26 FCC Rcd. 9160, 9161 (2011) (“Standing Rock”); Designation of Hopi Telecommunications, Inc., as an Eligible Telecommunications Carrier for the Hopi Reservation, Memorandum and Order, 22 FCC Rcd 1866 (2007) (“Hopi”); Designation of Fort Mojave Telecommunications, Inc., Gila River Telecommunications, Inc, San Carlos Telecommunications, Inc., and Tohono Odham Utility Authority as Eligible Telecommunications Carriers Pursuant to Section 214 of the Communications Act, Memorandum Opinion and Order, 13 FCC Rcd 4547 (1998); In the Matter of Telecommunications Carriers Eligible for Universal Serv. Support, Petitions for Designation as an Eligible Telecommunications Carrier For Purposes of Participation in Tribal Mobility Fund Phase I Second Amendment to Petition of NTUA Wireless, LLC, for Designation as an Eligible Telecommunications Carrier for Lifeline Service and for Conditional ETC Status to Participate in Tribal Mobility Fund Phase I (Auction 902) on the Navajo Nation, Order, 29 FCC Rcd. 1669, 1670 (2014), In re Telecommunications Carriers Eligible for Universal serv. Support, 26 FCC Rcd 9160 (June 22, 2011).

In summary, under the U.S. Constitution, the basic principles of federal Indian law, Section 214(e)(6) of the Communications Act of 1934, as amended, and established Commission precedent designating Tribally-owned carriers as ETCs, Redwire, as a majority-owned tribal carrier operating on tribal lands, is not "subject to the jurisdiction" of the Oklahoma Corporation Commission, and therefore, may apply directly to the FCC for a determination of its eligibility as an ETC.¹⁵

B. Redwire's Qualifications Meet or Exceed the Requirements to be Designated as an ETC.

As demonstrated below, Redwire meets the requirements for designation as an ETC as established under Section 214(e)(6) and Commission rules.¹⁶

1. Redwire Will Provide Service as a Common Carrier.

Redwire will provide service on a common carrier basis. Redwire is in the first phase of deployment of its wireless network which will allow Redwire to provide high speed/low latency broadband and voice services throughout its service area in the Otoe-Missouri Tribal lands. As such, Redwire certifies that it is a common carrier under 47 U.S.C. 214(e)(1) and 214(e)(6) for purposes of ETC designation.

¹⁵ Additionally, ETC designations are for a designated "service area," which by statute "means a geographic area," established by a state commission, (47 USC 241(e)(5)), or, in the case of a carrier serving Tribal areas not subject to state jurisdiction by a Tribal entity determining the tribal carrier's service area and approved by the Commission. Therefore, the Commission should grant ETC designation to WRI for WRI's entire service area within the Reservation. The Commission has emphasized the principles of tribal sovereignty and independence in designating the service area of a Tribal carrier serving residents on a Reservation. See, Standing Rock, 14-15 applying and quoting Twelfth Report And Order (Commission, as part of its public interest analysis in designating an additional competitive wireless ETC and designating Standing Rock's service area as the requested area within Reservation boundaries, concluded that its "fiduciary duty to conduct [itself] in matters affecting Indian tribes in a manner that protects the interest of the tribes" and to interpret "federal rules and policies... in a manner that comports with tribal sovereignty and the federal policy of empowering tribal independence.")

¹⁶ ETC designations are for a designated "service area," which by statute means "a geographic area," established by a state commission, 47 U.S.C. § 214(e)(5), or, in the case of a carrier serving Tribal areas not subject to state jurisdiction, by a Tribal entity determining the tribal carrier's service area and approved by the Commission. Therefore, the Commission should grant ETC designation to Redwire for that portion of Redwire's service area within the Otoe-Missouri Tribal lands.

2. Redwire Will Offer the Services Supported by the Federal Universal Service Support Mechanisms.

Redwire certifies that it will provide voice telephony service supported by federal universal service support mechanisms, including the following capabilities:

- (a) Voice Grade Access to the Public Switched Telephone Network or its functional equivalent¹⁷ — Redwire intends to meet this requirement through its provision of VoIP service that is interconnected to the public switched telephone network ("PSTN"). Redwire will offer this voice telephony service access as a stand-alone service at a rate comparable to similar service provided in urban areas. Similarly, Redwire's broadband service rates for its tiers of broadband service are reasonably comparable to those offered elsewhere in the State of Oklahoma.

This service includes minutes of use for local service provided at no charge to end users (specifically, plans are generally unlimited usage within the U.S.) and access to emergency services via 911 or E-911, wherever available from local government or public safety organizations. Redwire also commits to provide toll limitation services to qualifying low-income consumers as provided in the Commission's Rules.¹⁸

- (b) Broadband Internet Access Services — Redwire's broadband Internet offering 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.¹⁹

Redwire further commits to the provision of these services consistent with the Commission's high-cost universal support rules applicable to it.²⁰ Redwire will also offer Lifeline service, as required by the Commission, in all locations where it has been awarded support.²¹ Finally, Redwire commits to bid on requests for support from the E-Rate program from schools and libraries located within Redwire's designated ETC service area.

3. Redwire Will Provide Service Utilizing Its Own Facilities

¹⁷ Connect America Fund: A National Broadband Plan for Our Future et al., Report and Order and Further Notice of Proposed Rulemaking, at ¶78. (*"Lifeline Reform Order"*).

¹⁸ 47 C.F.R. § 54.101(a)(1).

¹⁹ 47 C.F.R. § 54.101(a)(2).

²⁰ 47 C.F.R. § 54.101(c).

²¹ 47 C.F.R. § 54.101(d).

Redwire commits to constructing its facilities to provide the supported services to the underserved and unserved locations within the CAF Phase II census block groups of its winning bids, as identified by the Commission (Exhibit A). The construction, operation and maintenance of the Redwire owned facilities shall conform to the deployment timelines of CAF Phase II coverage requirements. Redwire fully understands the deployment timelines of buildout to 40% of the required number of locations by the end of the third year of CAF funding, an additional 20% for each subsequent year, and 100% by the end of the sixth year of CAF Phase II support. Therefore, Redwire meets the requirement that supported services be provided via Redwire's own facilities.²²

4. Redwire Will Provide Service Throughout Its Designated Service Area

Redwire commits to provide and offer the supported services as defined in Section 54.101 of the Commission's Rules throughout its designated service area, consistent with all applicable requirements. Redwire's requested designated service area is within the boundaries of the Otoe-Missouria Tribal lands. A map of Redwire's designated service area is provided at Exhibit A.²³

5. Redwire Will Advertise the Availability of Its Services and Charges Utilizing Media of General Distribution.

Redwire will advertise the availability of, and charges for, its supported service offerings, utilizing media of general distribution, and will undertake outreach initiatives to increase customer awareness of Redwire's Lifeline service offering, consistent with all applicable requirements. Redwire intends to market its voice and Internet services to its customers via its website to notify the public of the availability of its service offerings. Redwire also intends to

²² 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1).

²³ Because Redwire will be providing service throughout its service area within the Otoe-Missouria Tribal lands, Redwire seeks to have its designated service area encompass all Tribal areas within its service area in the Otoe-Missouria Tribal lands.

market to its customers through advertising on local radio, the local newspaper, and other media outlets providing the Red Rock, Oklahoma community with news and updates.

6. Redwire Meets the Additional Requirements for Designation as an ETC

Redwire further certifies that it meets all of the Commission's requirements for designation as an ETC under Section 214(e)(6).²⁴

Compliance with Applicable Service Requirements. Redwire certifies that it will comply with the service requirements applicable to the support it receives, including any requirements for the CAF Phase II.²⁵

Ability To Remain Functional in Emergency Situations. Redwire certifies that its services will remain functional in emergency situations. Redwire's power system is designed to adhere to the regulatory requirements of Section 54.202(a)(2). Redwire's planned battery backup is designed to meet the DC load requirements to supply adequate reserve power for the telecom equipment during commercial AC failures and outages. The batteries consist of sufficient battery strings to maintain a minimum of eight (8) hours of battery reserve time.

To address commercial power failure outages beyond 8-hour battery reserve time, Redwire will utilize standby generator with auto transfer capabilities. Redwire will also install uninterruptible power supplies as backup power for the equipment at the subscriber premise to ensure that subscribers will maintain service during AC power outages.

To ensure that Redwire can reroute inbound and outbound traffic around damaged facilities, Redwire intends to establish redundant Internet transport service from two upstream providers. Redwire also intends to construct wireless backhaul facilities capable of rerouting traffic within the proposed targeted service area.

Redwire will implement quality of service (QoS) measures within the core and access networks to ensure that Redwire can manage traffic spikes resulting from emergency situations. The key metric in measuring QoS for VoIP traffic will be packet loss and latency. Redwire will proactively monitor the network via a cloud-based service and review all individual subscriber usage in real-time in order for each subscriber to receive a targeted level of Quality of Service during periods of peak usage.

²⁴ 47 C.F.R. § 54.202.

²⁵ 47 C.F.R. § 54.202(a)(1)(ii).

III. PUBLIC INTEREST STATEMENT

Because the Commission has recognized that in the context of the Connect America Fund Phase II auction, bidders demonstrate their ability to meet their public interest obligations in their short-form and long-form applications, CAF Phase II winning bidders "need not provide additional specific evidence of service to the public interest in their petitions for ETC designation."²⁶ Similarly, the Commission has waived, on its own motion, the requirement that a winning bidder seeking ETC designation file a five-year improvement plan and demonstrate that it will satisfy appropriate consumer protection and service quality standards.²⁷ Redwire is committed to expanding voice and broadband services to Tribal residents within the Otoe-Missouria Tribal lands which are currently unserved or underserved by current offerings and thereby Redwire does satisfy the public interest requirements for ETC certification.

IV. DRUG ABUSE ACT CERTIFICATION

Redwire certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

²⁶ *CAF ETC Public Notice* at 6.

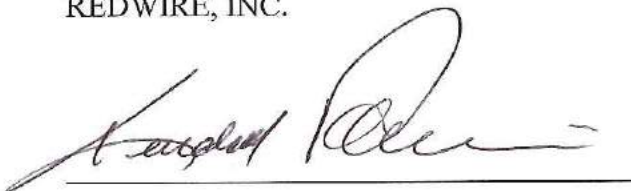
²⁷ *Id.* At 4-5.

V. CONCLUSION

As discussed above, designating Redwire as an ETC on the Otoe-Missouria Tribal lands for purposes of receiving USF support through the Connect America Fund, the Lifeline Fund, and other support, is consistent with the requirements of Section 214(e)(6) of the Act and is in the public interest. Redwire respectfully requests that the Commission approve its ETC designation expeditiously so that CAF Phase II funding will flow as soon as possible to support a timely buildout of broadband infrastructure facilities to the census block groups within the Otoe-Missouria Tribal lands for which Redwire is the winning bidder.

Respectfully submitted,

REDWIRE, INC.

A handwritten signature in black ink, appearing to read "Kendall Parrish", is written over a horizontal line.

Kendall Parrish, OBA #15039
Ron Comingdeer, OBA #8375
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hunter@comingdeerlaw.com

Its Counsel

February 15, 2019

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Pursuant to Section 214(e)(6) of the Act.)	

DECLARATION OF LESTER HARRAGARRA

I, Lester Harragarra, declare as follows:

1. I am over the age of 18, have personal knowledge of the matter set forth below, and am competent to be a witness herein. I submit this declaration in support of the Petition of Redwire for Designation as an Eligible Telecommunications Carrier ("ETC") for Lifeline Service ("Petition"), filed herewith.

2. I am the Treasurer and a Member of the Board of Directors of Redwire. My business address is 923 N. Robinson Ste 500, Oklahoma City, Oklahoma 73102.

3. The purpose of my Declaration is to affirm the facts and certifications required, pursuant to 47 C.F.R. §§ 54.201-202 for Redwire to obtain ETC designation.

4. I have reviewed the Petition of Redwire, and to the best of my knowledge, the facts stated therein are true and correct.

5. I certify that Redwire will provide Lifeline service to eligible customers and bid on any E-rate project that is proposed within its service area.

6. Redwire will provide voice-grade access to the public switched telephone network as part of its service package, which will allow customers to originate and terminate calls within a local calling area without incurring toll charges.

7. Redwire will provide toll limitation services, as required by 47 C.F.R. § 54.401(a)(2), if its package offerings to the extent that they distinguish between local and toll calls at the point of

8. Redwire will provide access to emergency services that will allow its customers to deliver automatic numbering information and automatic location information over the Redwire network to Public Safety Answering Points (PSAPs) that are capable of receiving and processing such information consistent with applicable state and federal E911 requirements.

9. Redwire will be able to function in emergency situations as set forth in 47 C.F.R.

S 54.202(a)(2). Redwire's network will have a reasonable amount of back-up power to ensure functionality without an external power source. Redwire is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergency situations.

10. Redwire will advertise the availability of, and charges for, its supported service offerings, utilizing media of general distribution, and will undertake outreach initiatives to increase customer awareness of Redwire's Lifeline service offering, consistent with all applicable requirements.

11. I certify that I am familiar with, and will comply with, the minimum coverage requirements, build-out requirements and reporting obligations as stated in Part 54 of Chapter 47 of the Code of Federal Regulations.

12. Redwire is financially and technically capable providing these telecommunications services, and, as a winning bidder in FCC Auction 903, Redwire has demonstrated its ability to efficiently offer service.

13. Attached as Exhibit B is a Certificate of Good Standing from the Oklahoma Secretary of State.

14. Copies of Redwire's Petition have been served upon the Parties listed on the Certificate of Service.

15. I certify, to the best of my knowledge, that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

I declare under penalty of perjury that the foregoing is true and correct,



Lester Harragarra

Signed this 15th day of February, 2019, at Red Rock, Oklahoma.

CERTIFICATE OF SERVICE

I hereby certify that I, Lester Harragarra, have caused the Petition of Redwire, Inc., for Certification as an Eligible Telecommunications Carrier, Pursuant to Section 214(e) (6) of the Act served via overnight courier on February 15th, 2019, to the following persons:

Mr. John R. Shotton
Chairman, Tribal Council
Otoe-Missouria Tribe
8151 Hwy 177
Red Rock, OK 74651

Mr. Lester Harragarra
Otoe-Missouria Development Authority
923 N. Robinson Ave., Suite 500
Oklahoma City, OK 73102

Mr. Brandy R. Wreath
Director, Public Utility Division
Oklahoma Corporation Commission
P.O. Box 52000
Oklahoma City, OK 73105 -2000



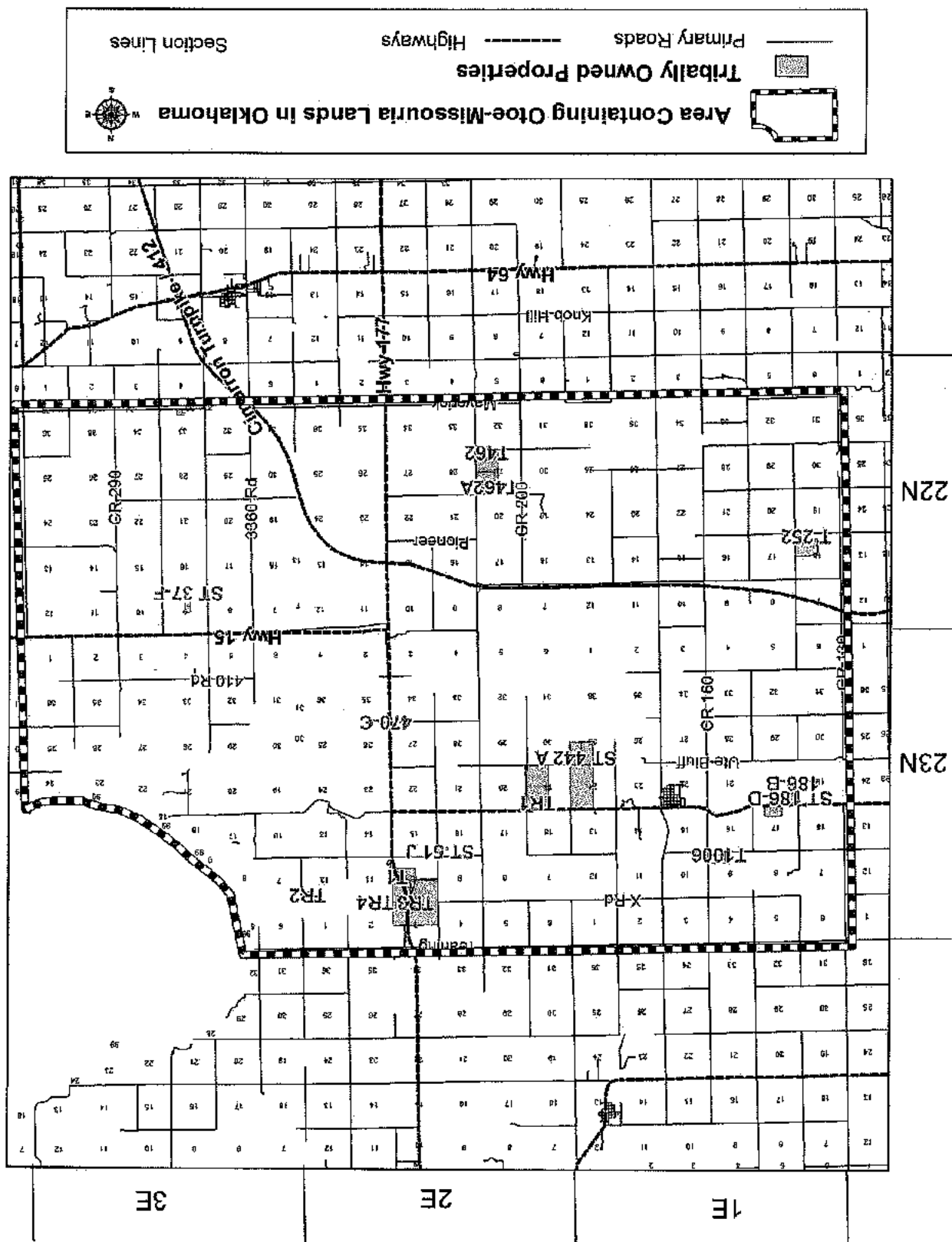
Lester Harragarra

Otoe & Missouri Surface Land Status LTM Plat Book

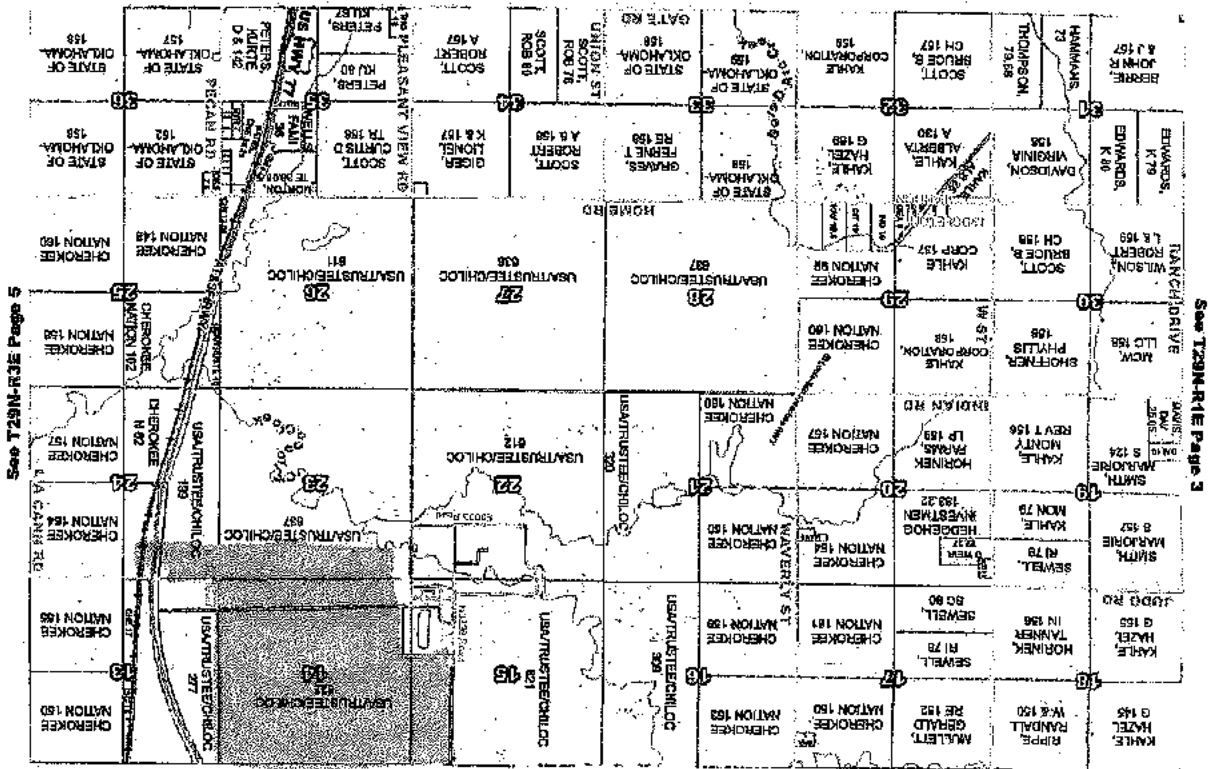


U.S. Department of the Interior
Bureau of Indian Affairs
Land Titles and Records Office



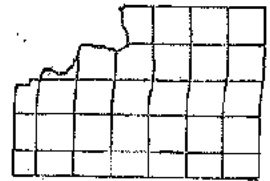
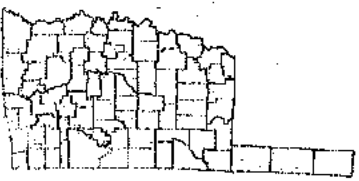


See T29N-R2E Page 11
 www.countyassessor.info
 1.877.700.4233
 sales@countyassessor.info



See T29N-R3E Page 5

See T29N-R1E Page 3



pg 4 of 6

Otoe & Missouri Surface Land Status

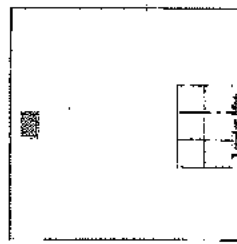
Township: T029NR002E

Trust Land Status Legend

Surface Tribal



Produced by Land Title Mapper October 09, 2008
Universal Transverse Mercator projection, Zone 14
Indian Meridian, NAD 83, CRS1980



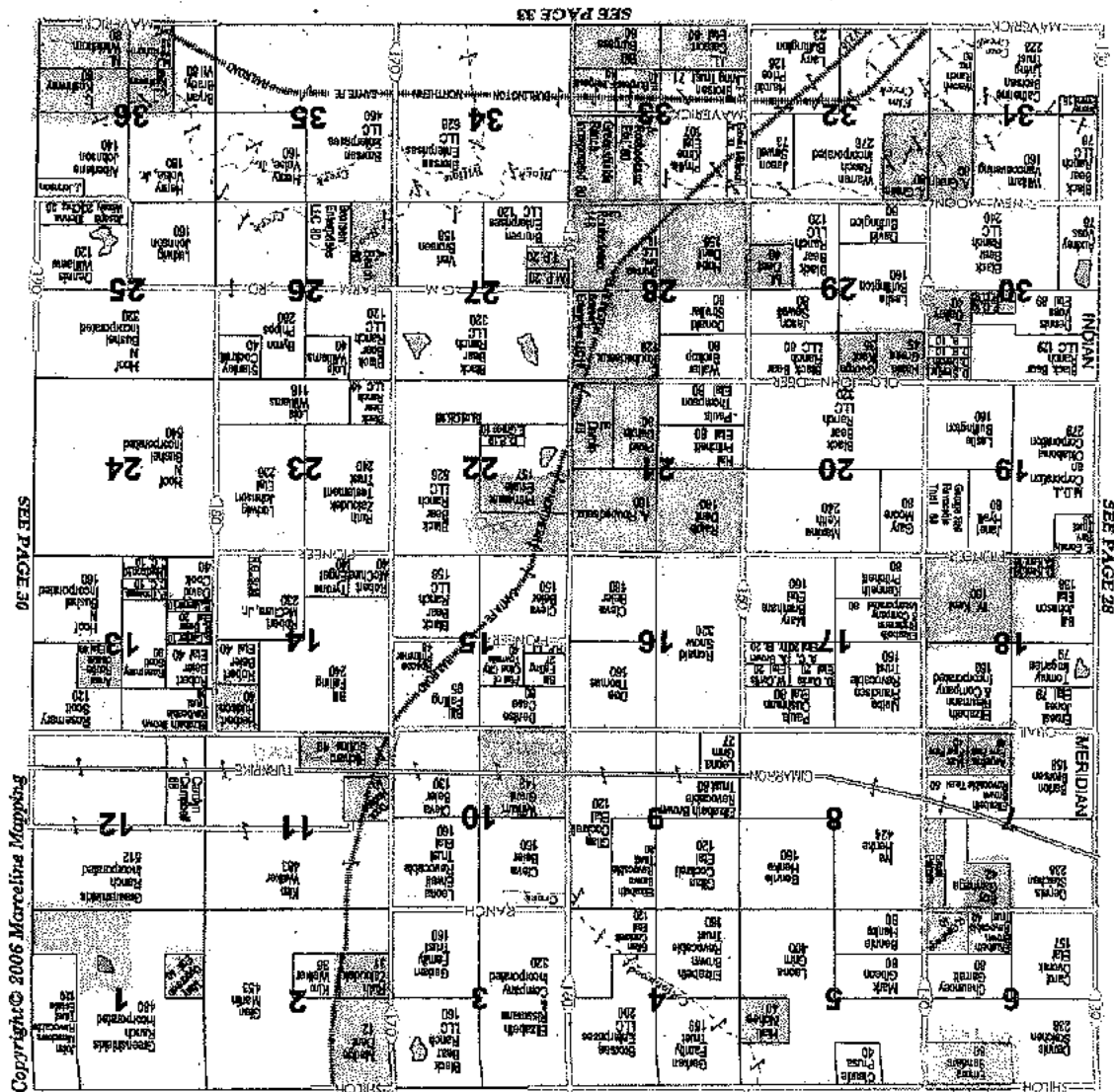
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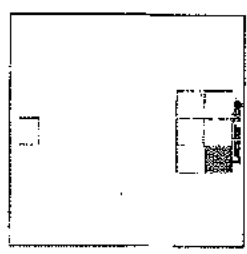
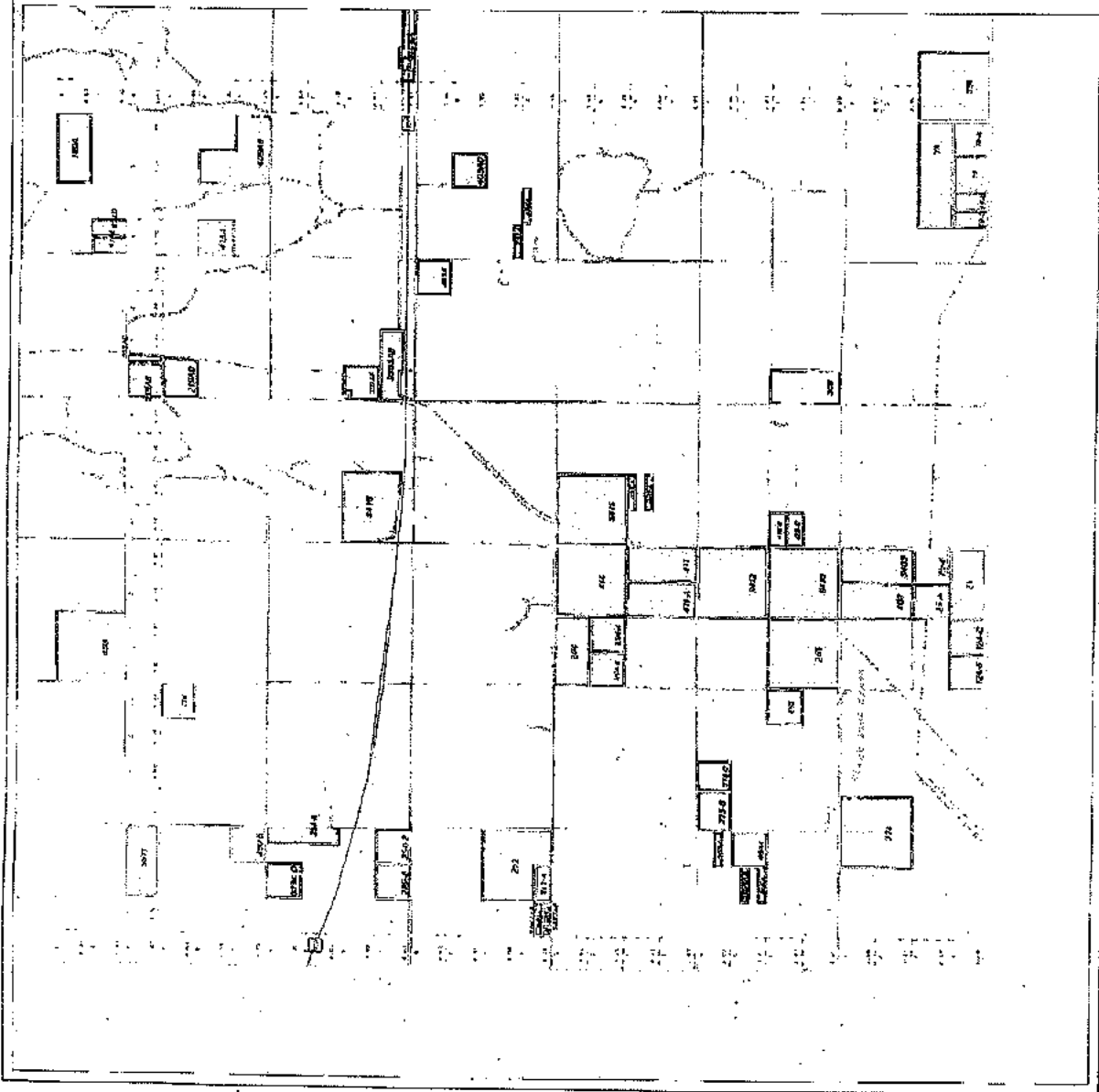
Otoe & Missouri Surface Land Status

Township: T022NR001E

Trust Land Status Legend

- Allotted
- Surface Owned

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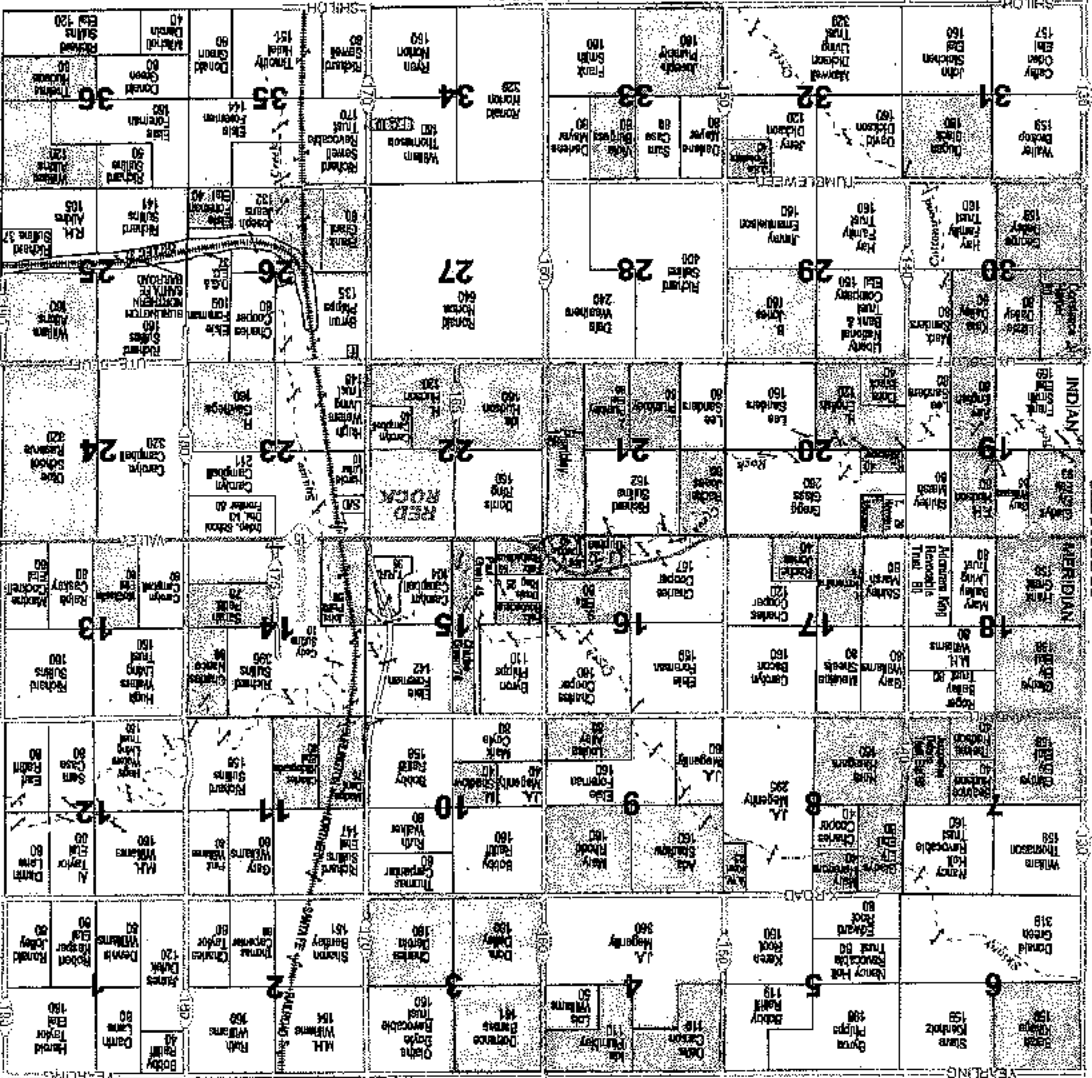
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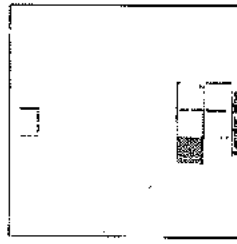
2325 Noble Co

Otoe & Missouri Surface Land Status

Township: T023NR001E

- Trust Land Status Legend
- Alotted
 - Surface Owned
 - Tribal
 - Tribal Reserve

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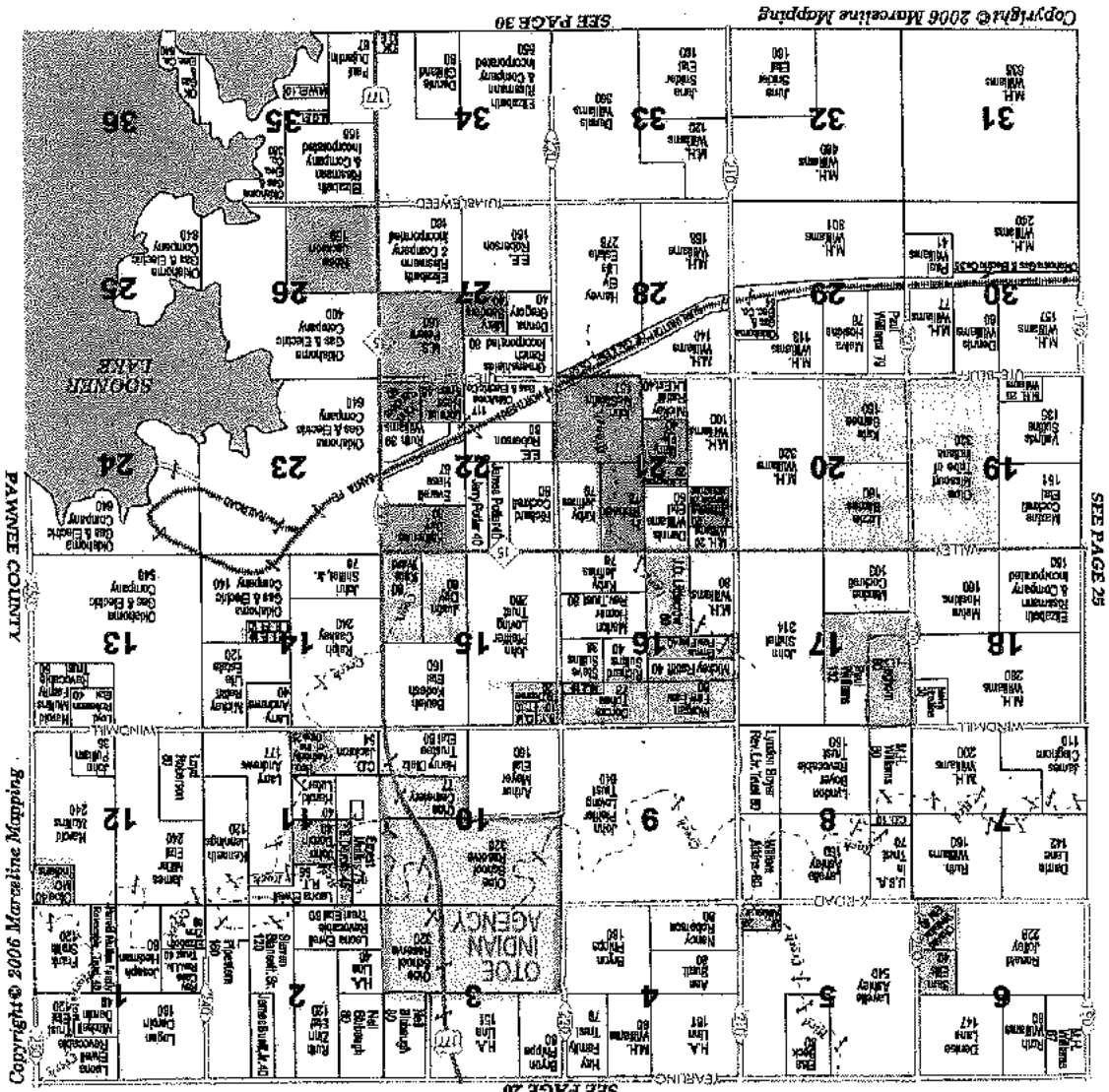


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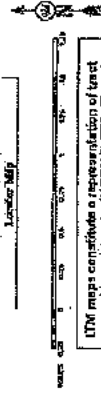
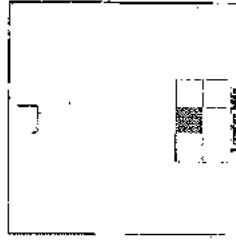
Otoe & Missouri Surface Land Status

Township: T023NR002E

Trust Land Status Legend

- Allotted
- Surface Owned
- Tribal
- Tribal Reserve

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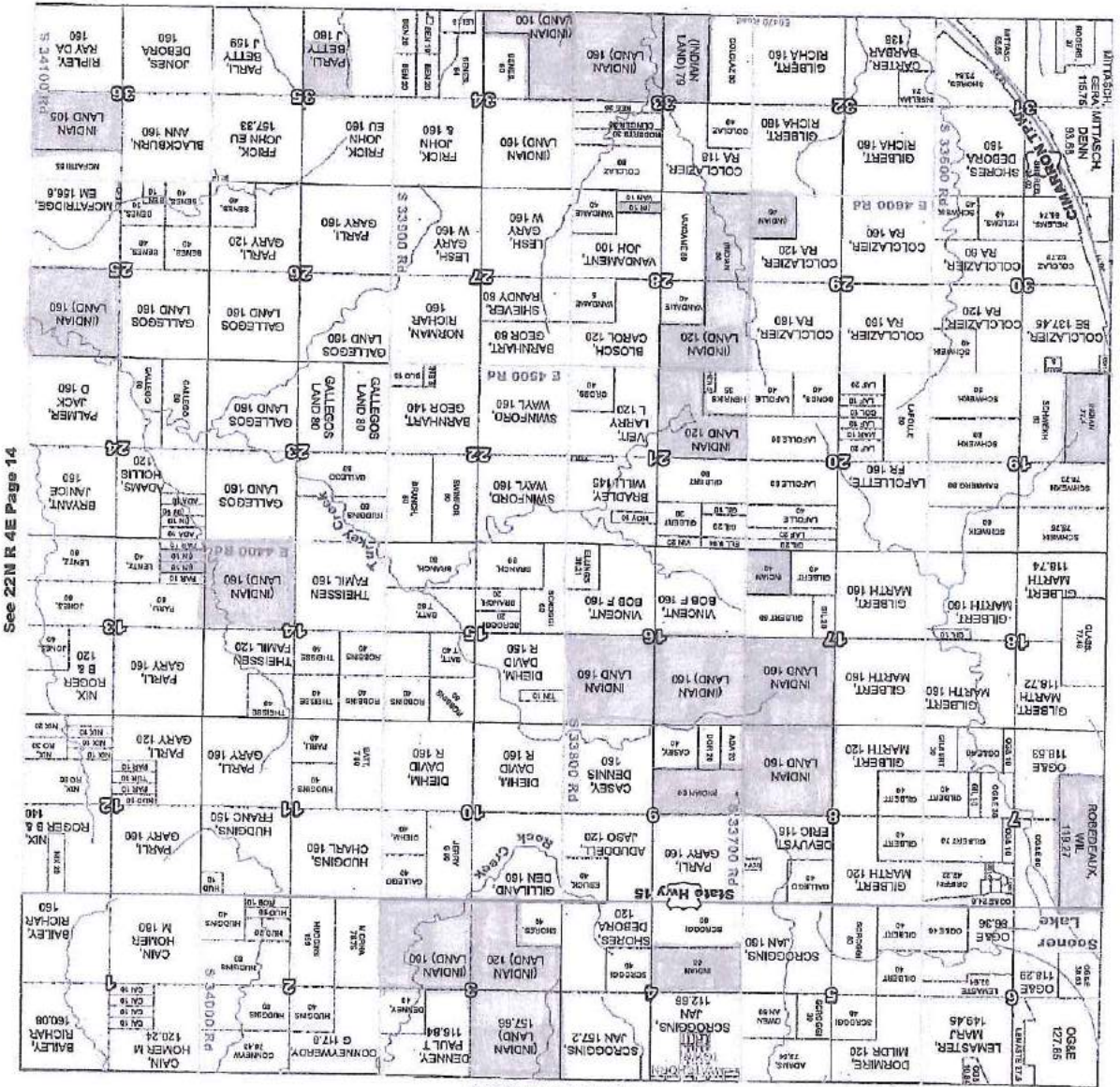
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Date

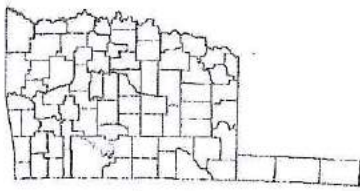
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See 23N R 3E Page 21



Pawnee County
22N R 3E



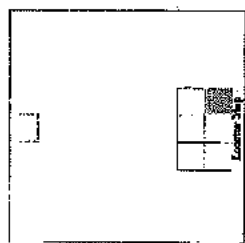
Township: T022NR003E

Trust Land Status Legend

Allotted

Surface Defects

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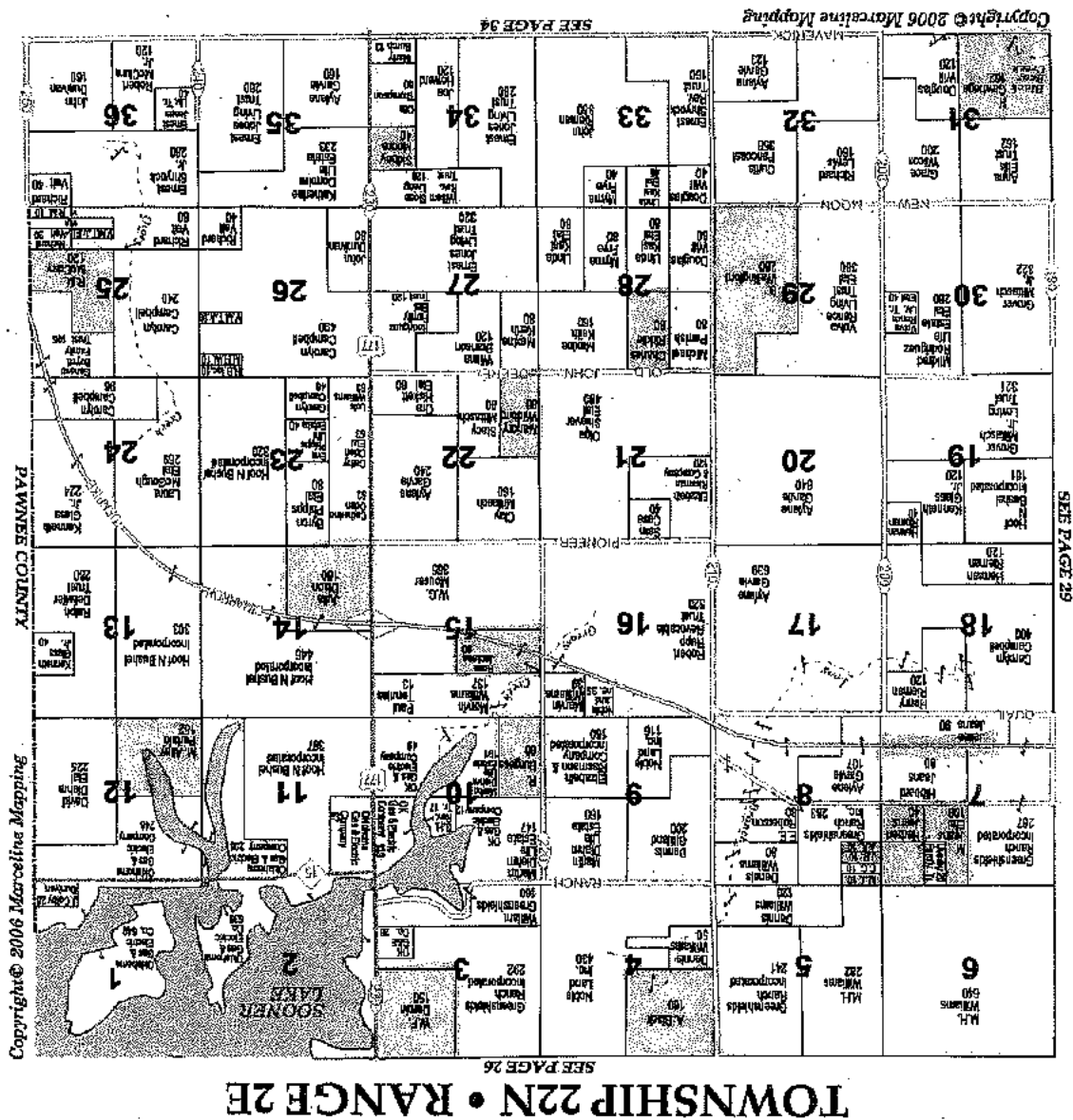
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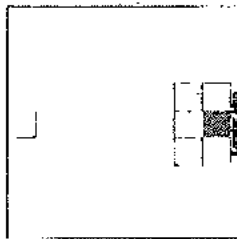
Trust and Status Legend

Aliotted

Surface Owned

Tribal

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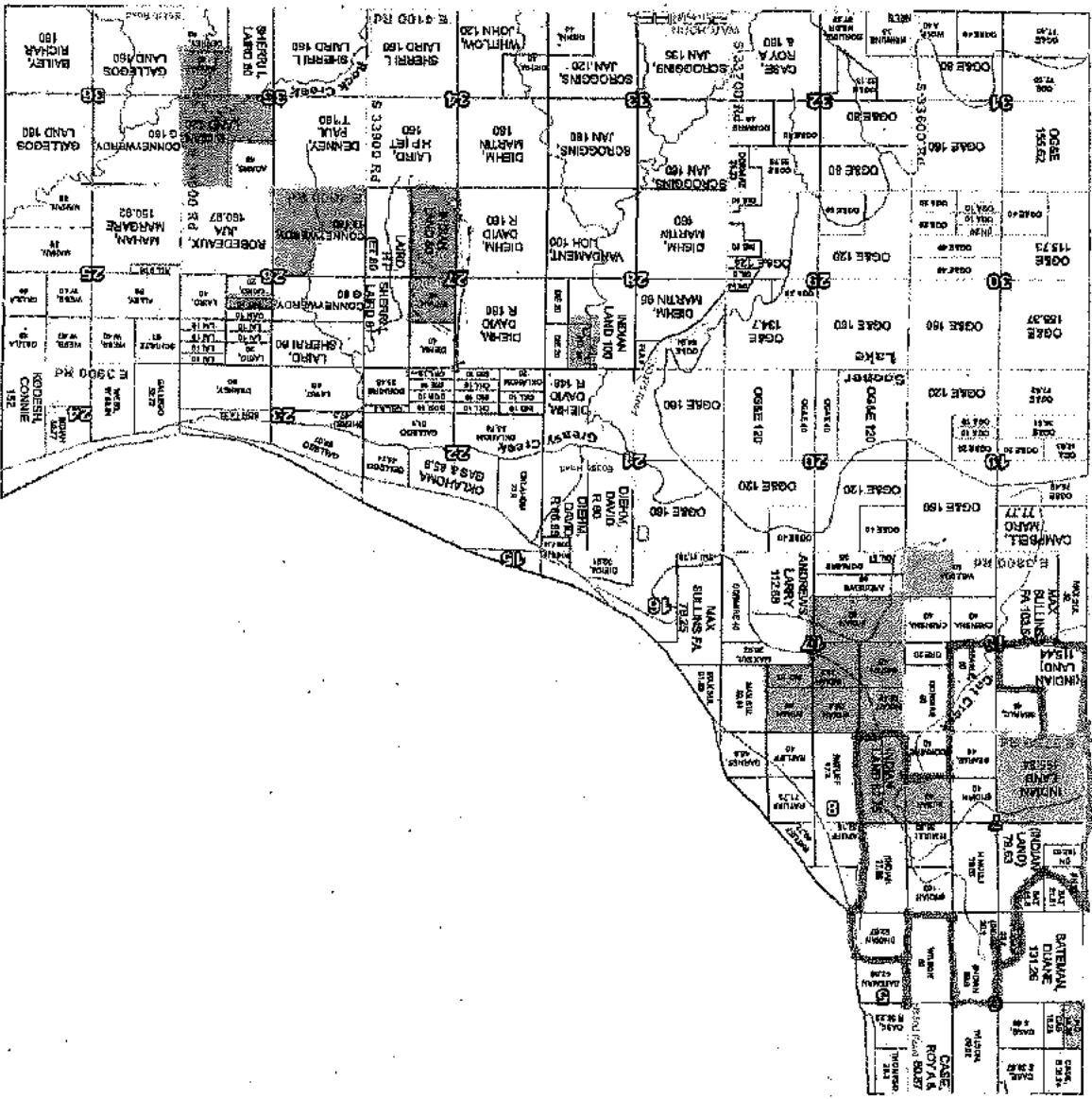
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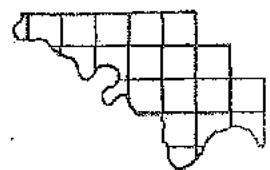
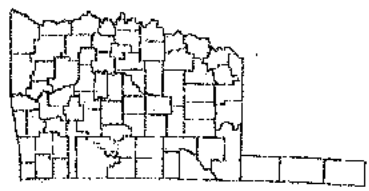
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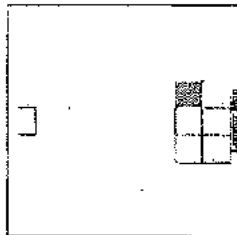
Otoe & Missouri Surface Land Status

Township: T023NR003E

Trust Land Status Legend

- ☐ Allotted
- ☐ Surface Owned
- ☐ Tribal Reserve

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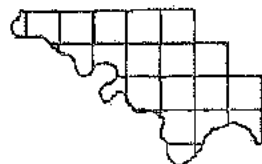
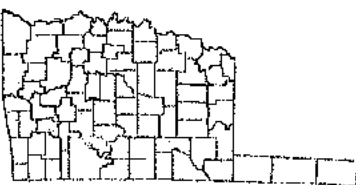
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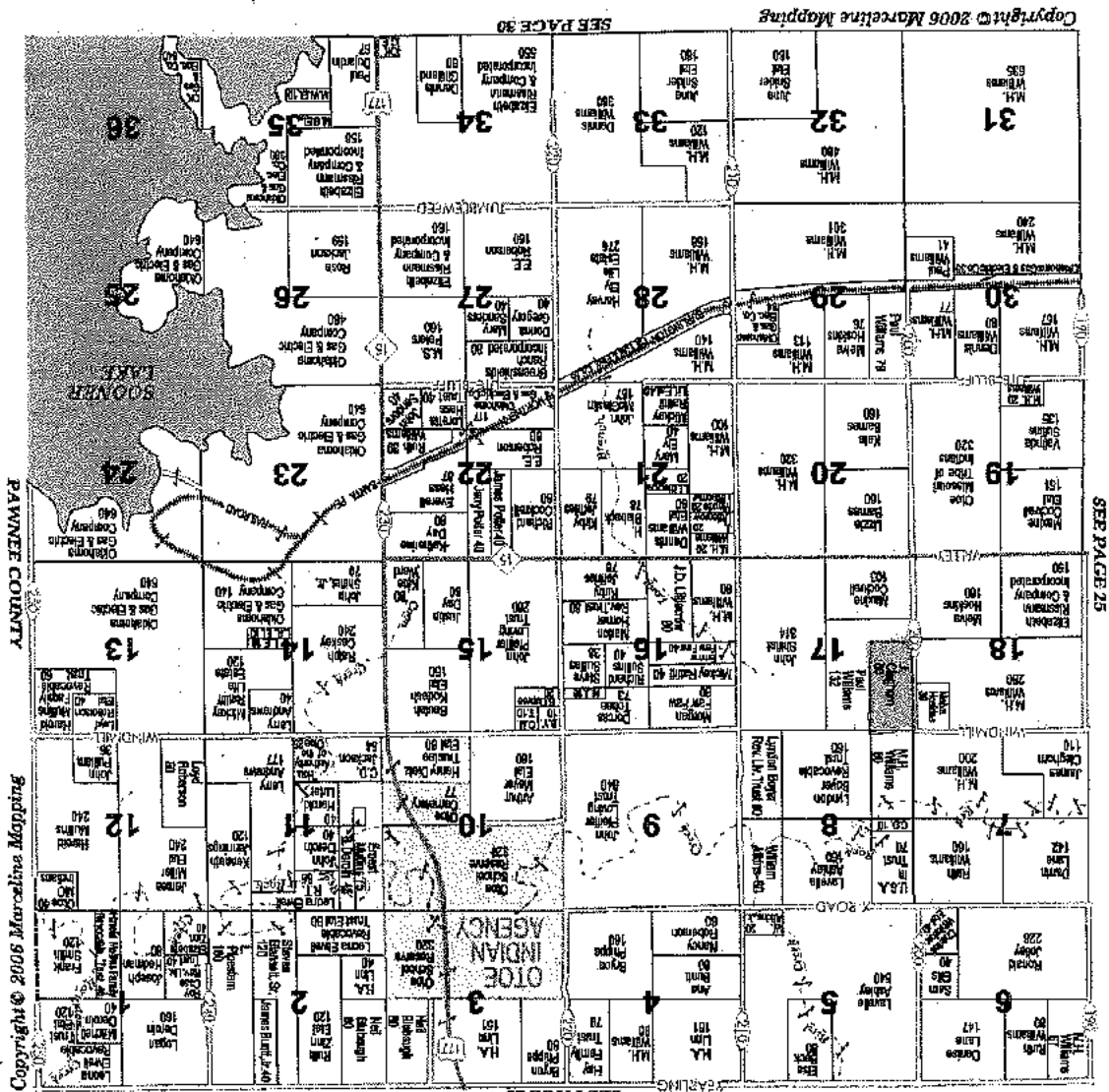


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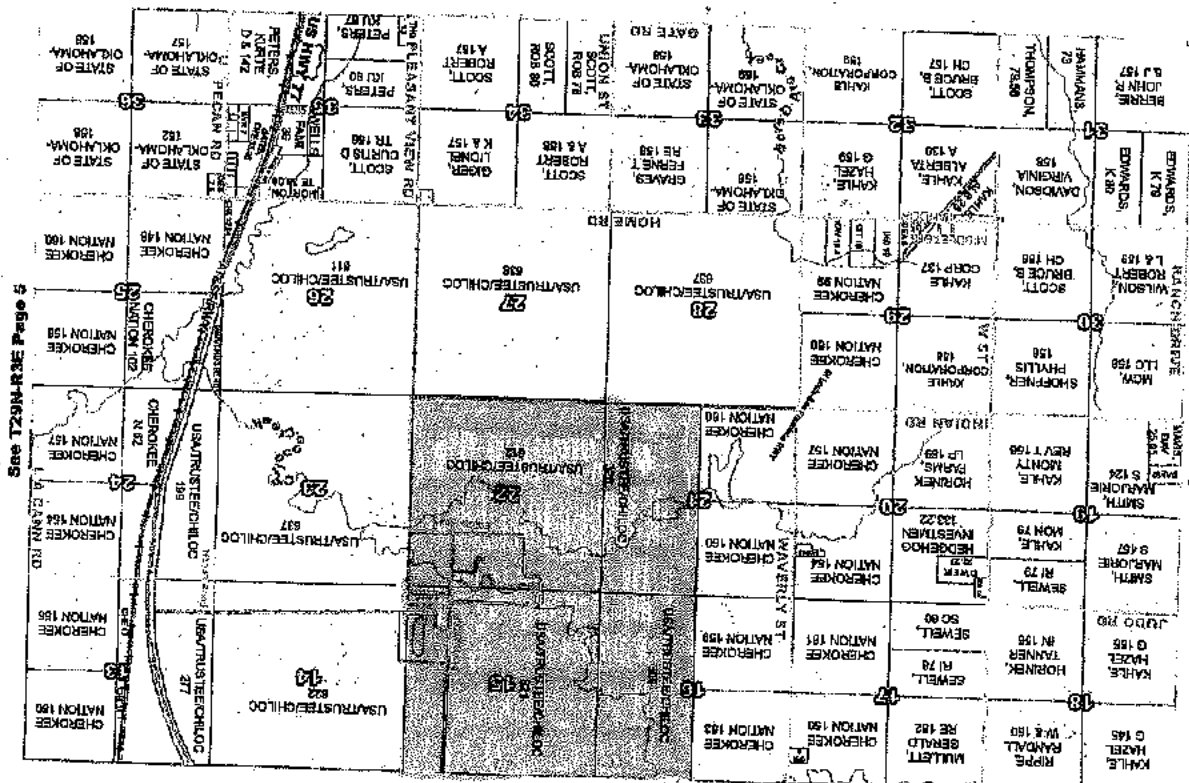
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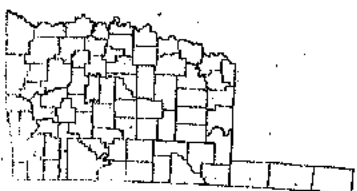
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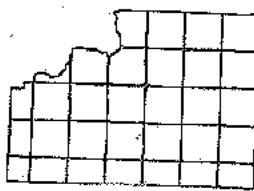
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