Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Petitions for Waiver of Universal Service High-Cost Deadlines	)	WC Docket No. 08-71
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
Connect America Fund – Alaska Plan	)	WC Docket No. 16-271
	)	
ETC Annual Reports and Certifications	)	WC Docket No. 14-58
	)	
Establishing Just and Reasonable Rates For Local Exchange Carriers	)	WC Docket No. 07-135

PETITION FOR EXPEDITED WAIVER BY
STATE TELEPHONE COMPANY
OF SECTION 54.316(c) OF THE COMMISSION'S RULES

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Date: June 12, 2020

TABLE OF CONTENTS

SUMMARY ii

I. BACKGROUND 2

II. GOOD CAUSE EXISTS FOR AN EXPEDITED GRANT OF THIS WAIVER, WHICH GRANT WILL ADVANCE THE PUBLIC INTEREST 7

A. Good Cause Exists for a Prompt Grant of this Waiver. 7

B. Prompt Grant of this Request Serves the Public Interest. 10

III. CONCLUSION 11

SUMMARY

State Telephone Company (the "Company" or "State") respectfully requests that an expedited waiver of the 47 C.F.R. § 54.316(c) High Cost Universal Service Broadband (the "HUBB") reporting deadline of March 1, 2019 (the "HUBB Deadline") be granted to ameliorate the adverse financial consequences associated therewith. State regrets the errors it made in the HUBB reporting process as outlined herein. Nonetheless, State respectfully submits that the corrective HUBB filing made by State in March 2020 supports the conclusion that, as will be more fully explained in this petition, good cause has been shown to support the grant of this waiver request and that the public interest also justifies such a prompt grant. Accordingly, State respectfully seeks from the Commission a directive to USAC to (1) accept without any withholding of CAF-BLS support for prior periods State's corrected 2016, 2017 and 2018 data regarding deployment reflected in the March 2020 corrective HUBB filing, (2) reimburse all withheld CAF-BLS support, and (3) disburse on a going-forward basis all CAF-BLS support to State based on the submissions the Company has made to USAC through the National Exchange Carrier Association, Inc.

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PETITION FOR EXPEDITED WAIVER BY
STATE TELEPHONE COMPANY
OF SECTION 54.316(c) OF THE COMMISSION'S RULES

State Telephone Company (the "Company" or "State"),[1] by counsel and pursuant to 47 C.F.R. § 1.3, respectfully requests that an expedited waiver of the 47 C.F.R. § 54.316(c) High Cost Universal Service Broadband (the "HUBB") reporting deadline of March 1, 2019 (the "HUBB Deadline") be granted to ameliorate the adverse financial consequences associated therewith. State regrets the errors it made in the HUBB reporting process. The errors in the March 2018 HUBB filing were the result of State's misunderstandings of the time period to be addressed in such HUBB filings, and the error in both the 2018 and 2019 HUBB filings was the lack of geocoded information in both submissions. Nonetheless, State respectfully submits that the corrective HUBB filing made by State in March 2020 supports the conclusion that, as will be more fully explained below, good cause has been shown to support the grant of this waiver

[1] Attached hereto is the Declaration of Joseph H. Warren, President of State and of Mark R. Evans, Vice President of State verifying the factual assertions made herein. Mr. Warren is the certifying officer for the Company; Mr. Evans prepares the necessary submissions pursuant to the oversight of Mr. Warren. *See* Attachment A.

request and the public interest also justifies such grant This is particularly true where, as here, no interim buildout milestones are applicable to State as a Connect America Fund Broadband Loop Support ("CAF-BLS") company, but only a completion date for meeting company-specific 25/3 Mbps location deployment which the facts demonstrate State has surpassed.[2]

Accordingly, State respectfully submits that withholding of its CAF-BLS disserves the public interest and that this waiver request should be granted promptly. As such, State seeks a Commission directive to USAC to (1) accept without any withholding of CAF-BLS support for prior periods State's corrected 2016, 2017 and 2018 data regarding deployment reflected in the March 2020 corrective HUBB filing, (2) reimburse all withheld CAF-BLS support, and (3) disburse on a going-forward basis *all* CAF-BLS support to State based on the submissions the Company has made to USAC through the National Exchange Carrier Association, Inc. ("NECA").[3]

I. BACKGROUND

State operates approximately 4,100 access lines in the East Central portion of the State of New York. State operates two exchanges – Ravena and Coxsackie. The most northern portion of State's Rural Incumbent Local Exchange Carrier ("RLEC") service area – the Ravena Exchange -- is approximately 11 miles south to southeast of Albany, New York. As an interstate rate of return ("ROR") regulated RLEC, State elected to remain on "legacy" Universal Service

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[2] While State understands from the Universal Service Administrative Company ("USAC") that public information regarding 2019 HUBB reported buildouts has not yet been made public, USAC's public records when released will confirm that State has filed and certified the availability of a minimum speed of 25/3 Mbps to over 3,900 within the State serving area. *See* Section I, *infra.*

[3] *See* 47 C.F.R. § 54.901. As it does for other smaller incumbent local exchange carriers, NECA coordinates various federal submissions required of and USF disbursements made to the Company, including those related to CAF-BLS.

Fund ("USF") regulation. As noted above, the issue addressed herein arises as a result of State's HUBB reporting for its CAF-BLS support.

Because State was not providing 10/1 Mbps broadband to eighty percent (80%) or more of its locations,[4] the Company was required to make a HUBB filing originally scheduled for March 1, 2017 (which was subsequently extended to March, 2018).[5] Although the *February 2017 Order* required the submission of newly deployed locations from May 25, 2016 through December 31, 2017,[6] State erroneously believed that its March 2018 HUBB filing was limited to locations newly deployed during 2017. Based on this misunderstanding, State made its March 2018 HUBB filing reporting that, in 2017, no new 10/1 Mbps locations had been deployed.[7]

State attempted to make a similar filing in March of 2019. However, unlike the misunderstanding on which it based its March 2018 HUBB filing, State's March 2019 HUBB filing of no "new locations" was complicated by the fact that, while State had completed newly deployed locations with a minimum speed of 10/1 Mbps in 2018,[8] State did not have the geocoding information necessary to make a complete HUBB filing. As such, State attempted to

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[4] *See In the Matter of Connect America Fund, et al., Report and Order, Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking*, WC Docket Nos. 10-90, *et al.*, FCC 16-33, released March 30, 2016 at ¶ 175.

[5] *See In the Matter of Connect America Fund, Order*, WC Docket No. 10-90, DA 17-196, released February 24, 2017 (the "*February 2017 Order*") at ¶¶ 2, 4.

[6] *See id.* at ¶ 12.

[7] At the time of its 2018 March HUBB filing, 10/1 Mbps was the speed for locations that were required to be reported. *See* 47 C.F.R. § 54.308(a)(2) (March 1, 2018 version of Electronic Code of Federal Regulations ("ECFR")).

[8] *See* 47 C.F.R. § 54.308(a)(2) (March 1, 2019 version of ECFR).

make its 2019 HUBB submission based on the lack of geocoded locations to verify deployment, namely that there were no new locations to report.[9]

State believed its actions to secure geocoding information beginning in 2017 were reasonable. Specifically, in 2017 and believing its March 2018 HUBB filing for 2017 calendar year was accurate and complete, State sought to secure the necessary geocoding expertise initially through good faith reliance on the work of an employee of another telephone company. This effort was abandoned in 2018 when the individual indicated he could not complete the project. State then sought assistance from outside vendors and from an individual employed by another telephone company, but to no avail. In early 2019, the vendor expertise necessary to complete geocoding was secured by State and the geocoding of locations proceeded but remained incomplete until December 2019.

As USAC's records will confirm, State did possess the geocoded information needed to submit a complete March 2020 HUBB filing, and State did so. In March of 2020, State certified in the HUBB geocoded information for over 3,900 locations were capable of receiving service at or above the new minimum speed of 25/3 Mbps,[10] exceeding by a considerable measure the CAF-BLS obligation applicable to State.[11]

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[9] State thought it had made the necessary March 2019 certification of no new locations but has since learned from the USAC that no such certified March 2019 HUBB filing was made. State's efforts in March 2019 to seek a certification of "no new locations" was deemed to be an honest and forthright response because, as explained herein and despite its efforts, the Company had no geocoded information to verify its broadband-capable locations and thus was unable to submit a complete HUBB filing.

[10] The reportable locations' speed for States' 2020 HUBB filing was a minimum of 25/3 Mbps. *See* 47 C.F.R. § 54.308(a)(2) (March 2, 2020 version of ECFR).

[11] The Company notes that the USAC website: https://www.usac.org/high-cost/resources/tools (after which, one needs to click the ACAM I, ACAM II and CAF-BLS Buildout tab under "Data Tools") shows that State must provide CAF-BLS to 1145 locations, far less than what the HUBB filing made by State in 2020 reported. *See also Wireline Competition Bureau Announces Posting of Information Regarding Revised Deployment Obligations for Incumbent Rate of Return*

Unquestionably, State was candid with USAC with respect to the Company's inability to make a complete HUBB filing based on the lack of geo-coded location information. Shortly after State's 2019 HUBB filing, State was contacted by Mr. Stephen Snowman at USAC. Mr. Evans, on behalf of State, responded. In his discussion with Mr. Snowman, Mr. Evans believed he was clear that the lack of State's deployment data within the HUBB (the focus of Mr. Snowman's inquiry) was based on State's inability to make a complete filing due to the lack of geocoded information. State memorialized those discussion in the attached email that Mr. Evans sent to Mr. Snowman.[12]

During this conversation with Mr. Snowman, Mr. Evans recalls no issue being discussed regarding the lack of certification of State's March 2019 HUBB filing. As noted above, it was only confirmed recently by USAC that beginning in January of 2020 CAF-BLS payable to State was being withheld due to a lack of certification of the March 2019 HUBB submission.

As reflected in the HUBB filing made in March of 2020, State uploaded in excess of 3,900 geocoded locations meeting the *current* 25/3 HUBB reporting trigger for CAF-BLS.[13] Now possessing the necessary geocoding information to make a complete filing relating to its 2018 and 2019 HUBB submissions, State respectfully submits that its March 2020 HUBB filing should be viewed as a proper corrective filing.[14] State worked diligently to enable this March 2020 reporting to occur four (4) years ***before*** the December 31, 2023 deadline for compliance

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Carriers, Public Notice, DA 19-373, released May 2, 2019, at 1 (referenced excel spreadsheet at line 26). State's March 2020 HUBB filing surpassed this 1,145 location requirement.

[12] *See* Attachment B.

[13] *See* 47 C.F.R. § 54.308(a)(2) (March 2, 2020 version of ECFR).

[14] The Company also notes that for its locations certified in its March 2020 HUBB filing reflected two deployment dates, mid-2016 and mid-2018. These are the dates that the Company believes, in good faith, was a reasonable approximation of the date by which the reported location had the necessary broadband speed available.

with the requirements established under Section 54.308(a)(2) of the Commission's Rules.[15] In doing so, State ultimately certified its March 2020 filing on March 3, 2020, after working with USAC to correct certain geocoded location information that the HUBB system did not accept.[16]

State's ability to continue its network and service deployment goals will be adversely impacted absent a grant of this waiver and such adverse impacts will be more problematic if such waiver is not granted promptly. For example, absent prompt grant of this wavier, State will now need to determine whether to proceed with planned switch and fiber management upgrades, as well as planned fiber expansion plans. Likewise, planned network generator upgrades and replacement of outside plant repair and maintenance vehicles will need to be re-evaluated. The Company's ability to maintain, deploy and operate will be even more difficult (and the public interest will be harmed) if what are effectively corrective filings for the March 2018 and 2019 HUBB submissions result in the continued withholding of the Company's CAF-BLS. Prompt action and grant of this waiver request based on the good cause shown would resolve this situation and such grant is in the public interest.

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[15] *See In the Matter of Connect America Fund, et al., Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration*, WC Docket Nos. 10-90, *et al.*, FCC 18-176, released December 13, 2018 (the "*2018 December ROR Order*") at ¶ 110 ("To be consistent with CAF BLS deployment obligations being based on a five-year term, the deployment term will run from the effective date of this Report and Order until December 31, 2023.").

[16] In this regard, on March 12, 2020 State was informed by USAC that State's March 3, 2020 HUBB filing was deemed late filed. At the same time, USAC indicated to State that it could utilize the Commission's grace period outlined in Section 54.316(c)(1)(iii). In reliance on the USAC information, State previously opted in good faith to use this grace period on March 23, 2020.

II. GOOD CAUSE EXISTS FOR AN EXPEDITED GRANT OF THIS WAIVER, WHICH GRANT WILL ADVANCE THE PUBLIC INTEREST

A. Good Cause Exists for a Prompt Grant of this Waiver.

The Commission may waive the requirements of its rules based on "good cause."[17] As the courts have made clear

> [t]he Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest. *Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*). In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166. Waiver of the Commission's rules is appropriate only if both (i) special circumstances warrant a deviation from the general rule, and (ii) such deviation will serve the public interest. *NetworkIP, LLC v. FCC*, 548 F.3d 116, 125-128 (D.C. Cir. 2008); *Northeast Cellular*, 897 F.2d at 1166.[18]

The Company respectfully submits that special circumstances do, in fact, exist and support a grant of its request. HUBB reporting was a relatively new filing requirement in a system that was also relatively new. The Company's 2019 HUBB filing was only the second such filing that the Company was required to make. The Company's March 2018 HUBB filing inadvertently only contained calendar year 2017 data.[19] Based on this error, the Company made what it rationally believed to be an accurate submission -- no new locations. Although State intended for its March 2019 HUBB filing to properly report no new locations solely for calendar

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[17] *See* 47 C.F.R. § 1.3.

[18] *In the Matter of Connect America Fund et al., Order*, WC Docket No. 10-90 *et al.*, 27 FCC Rcd 15768 (2012) at n. 9. State notes that, in a somewhat analogous situation in which companies did not make a March 2019 HUBB filing due to the reporting of no new locations in 2018, the Commission has granted a waiver of the HUBB filing deadline. *See In the Matter of Petitions for Waiver of Universal Service High-Cost Filing Deadlines, et al., Order*, WC Docket No. 08-71, *et al.*, DA 19-1227, released December 2, 2019 ("*HUBB Waiver Order*") at ¶¶ 17, 28.

[19] State would have new locations to report in the event that its error of eliminating the May 26, 2016 through December 31, 2016 was known. However, even in this case, State would not have any geocoded location to make a complete HUBB filing.

year 2018 data, that filing was based on State's good faith belief that this submission was proper based on the lack of geocoded verifying information.

Now understanding its errors related to the scope of the 2018 HUBB filing and the impacts associated with the lack of complete geocoding information required for both the 2018 and 2019 HUBB filings, State regrets its inability to submit geocoded HUBB locations within the proper time frames. However, consistent with its candor with USAC,[20] and once such geocoded information was available, the Company moved forward to report its achievement of the overall objective of the Commission – the provision of 25/3 Mbps to CAF-BLS eligible locations to consumers – in the Company's March, 2020 HUBB filing.[21] Although such reporting compliance was delayed, the ultimate consumer objective of the HUBB program

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[20] *See* n. 12, *supra*, and accompanying text. With respect to forthrightness in the context of a HUBB submission, the Commission stated the following in its *Wireline Competition Bureau Provides Guidance To Carriers Receiving Connect America Fund Support Regarding Their Broadband Location Reporting Obligations, Public Notice*, WC Docket No. 10-90, DA 16-1363, released December 8, 2016 (the "*2016 HUBB Public Notice*"):

> We remind carriers that they have an obligation under section 54.316 to, in good faith and to the best of their knowledge, file complete and accurate information in the HUBB. This includes the obligation to file *all* locations to which a carrier has made service available in accordance with its specific obligations for the reporting period, not just a subset of those locations. Carriers also have a duty to correct or amend submitted information if they have reason to believe, either through their own investigation or upon notice from USAC, that the data is inaccurate, incomplete, or contains data errors or anomalies. This duty to correct or amend applies both before and after the carrier has filed and certified as complete its report for each reporting period. Carriers will not, however, be subject to non-compliance measures based on the information they have filed or omitted for a particular reporting period until the reporting period deadline has passed.

Id. at 11-12 (footnotes omitted) (emphasis in original).

[21] *See, e.g., December 2018 ROR Order* at ¶ 3 and ¶ 109 ("To ensure that consumers in rural areas enjoy a reasonably comparable quality of broadband as those in urban areas, we revise the deployment obligations to require recipients of CAF BLS to offer broadband service at actual speeds of at least 25/3 Mbps.") (footnotes omitted).

related to CAF-BLS – reporting the availability of a minimum 25/3 Mbps broadband to locations– has now been achieved and HUBB data certified by the Company.[22]

State respectfully submits that no permanent harm to the HUBB reporting regime has been experienced because no *interim* milestone requirements applicable to CAF-BLS companies exist. Rather, the necessary reporting to confirm the ultimate deployment of 25/3 Mbps to the required locations of a CAF-BLS company has occurred.[23] Assuming arguendo that some harm exists for the lack of 10/1 Mbps reporting by State at the time of the 2018 March and 2019 HUBB filing deadlines,[24] State notes that the 25/3 Mbps speed standard had already been established generally,[25] and by the March 2019 HUBB filing deadline, the 10/1 Mbps standard (although not then in effect) had been supplanted by the *2018 December ROR Order* addressing reportable CAF-BLS broadband deployment.

Finally, what is now clear is that, by its March, 2020 HUBB filing, State had complied with all of its required CAF-BLS deployment obligations and those locations have been reported in the HUBB as being capable of providing 25/3 Mbps broadband service to subscribers. In doing so, and meeting its buildout requirements several years in advance, any shortcoming of the Company in its prior HUBB filings have been addressed and penalizing the Company for any past failings is unduly harsh and contrary to the public interest.

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[22] *See* n. 11, *supra.*

[23] *See, e.g.,* n. 2, *supra.*

[24] *See* 47 C.F.R. § 54.308(a)(2) (Reporting based on 10/1 Mbps speeds) (March 1, 2018 version of ECFR) and 47 C.F.R. § 54.308(a)(2) (Reporting based on 10/1 Mbps speeds) (March 1, 2019 version of ECFR).

[25] *See generally In the Matter of Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, 2018 Broadband Progress Report*, GN Docket No. 17-199, FCC 18-10, released February 2, 2018 at ¶15; *see also 2018 December ROR Order* at ¶ 1. In this regard, in December 2018, the FCC made clear its efforts have been to "bridge the digital divide" which was focused on the availability of 25/3 Mbps broadband capability. *See 2018 December 2018 ROR Order* at ¶ 1.

B. Prompt Grant of this Request Serves the Public Interest.

During the first quarter 2020 and continuing to date, State has experienced monthly withholdings of significant CAF-BLS-related USF monies that State anticipates will approximate $1,500,000 annually. Such withholding directly conflicts with the network deployment and operations undertaken by the Company as outlined herein (and the cost incurred in connection therewith) particularly when considering the Company's now-reported significant deployment of 25/3 Mbps capable locations as of December 31, 2019. Consequently, the withholding of any CAF-BLS monies disserves the public interest, let alone the rational anticipation by State of the availability of these USF monies not only to recover State's investment but also to be utilized for State's voice and broadband operational expenses.

A grant of this waiver request would allow the Company to receive its much-needed CAF-BLS payments and will also advance the Commission's overarching policy of encouraging broadband deployment, proper cost recovery and the submission of accurate and accountable broadband deployment data. Such benefits to be derived by a grant of the requested waiver advance the public interest, particularly when the Company undertook prompt and considerable 25/3 Mbps broadband deployment.

State also respectfully submits that no entity is harmed by a prompt grant of this waiver. As of March 2020, State's HUBB filing was in line with the Commission's rulings. State may have been late in providing the necessary newly deployed geocoded location information in the HUBB, but it is not aware of any formal complaint regarding its broadband offerings during the period it was not in compliance. State was candid with USAC regarding the lack of geocoded location information. When its planned course of securing geocoding changed in 2018, the Company believed it took reasonable steps to secure its compliance in 2019 based on the use of outside vendor resources. And, ultimately, at the end of calendar year 2019 a considerable

number of end user consumers located within State's service area now have access to a fiber-based system for broadband service with a considerable number of locations capable of 25/3 Mbps four (4) years in advance of the CAF-BLS buildout obligation applicable to State.[26] At the same time, as stated in Section I, *supra*, State fully anticipates that the elimination of CAF-BLS disbursements in 2020 will affect the Company's on-going operations and State's objective of continuing to provide reliable and quality service to the State end users.

Finally, State does not believe that any bar to a prompt Commission grant of a waiver is present.[27] The Wireline Competition Bureau has already granted waivers of the HUBB reporting guidelines in the *HUBB Waiver Order*, and State respectfully submits that the underlying objective of that decision and other Commission decisions associated with tracking 25/3 Mbps broadband deployment has been met in the instant case, albeit in an alternative way than under the existing Commission rules.

III. CONCLUSION

Accordingly, for the reasons provided herein, the Company respectfully submits that good cause and special circumstances exist for an expedited grant of this waiver request, and that

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[26] The Commission has stated that the "universal service challenge of our time is to ensure that all Americans are served by networks that support high-speed Internet access—in addition to basic voice service—where they live, work, and travel. " *In the Matter of Connect America Fund, et al., Report and Order and Further Notice of Proposed Rulemaking*, WC Docket Nos. 10-90 *et al.*, 26 FCC Rcd 17663, at ¶ 5 (2011) ; *aff'd sub nom., In re: FCC 11-161*, 753 F.3d 1015 (10th Cir. 2014) (*In re: FCC 11-161*). Nowhere is this need better demonstrated than the reliance on broadband during the COVID-19 pandemic since the "work" place is often times the broadband consumer's home.

[27] One such prompt method for granting the instant request is through the use of the reporting on USAC streamlined requests for actions, such as what the Commission did on April 30, 2020. *See Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company, Public Notice*, CC Docket No. 02-6, *et al.*, DA 20-464, released April 30, 2020 (the "*USAC Public Notice*") at 8 (Grant of waiver of HUBB reporting deadline to Peñasco Valley Telephone Cooperative, Inc.). The *USAC Public Notice* indicates that the grant was made consistent with the Commission's *HUBB Waiver Order* (*see id.* at 8, and *id.* at n.8), a result State respectfully submits also applies here.

the public interest would be served by the Commission promptly directing USAC (1) to accept without any withholding of CAF-BLS for prior periods the corrected 2016, 2017 and 2018 data regarding deployment reflected in the Company's March 2020 HUBB report, (2) to reimburse the Company for all withheld CAF-BLS, and (3) to disburse on a going-forward basis *all* CAF-BLS to the Company based upon the submissions made to USAC by the Company.

Respectfully submitted,

State Telephone Company

By: _____

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Date: June 12, 2020

ATTACHMENT A

DECLARATION

I, Joseph H. Warren, hereby declare that I am President of State Telephone Company (the "Company"); that I have read the forgoing "Petition for Expedited Waiver by State Telephone Company of Section 54.316(C) of the Commission's Rules" (the "Document"); and that the contents of the Document with respect to the Company is true and correct to the best of my knowledge, information, and belief.

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

Executed this 12th day of June, 2020.

Joseph H. Warren
President
State Telephone Company

DECLARATION

I, Mark R. Evans, hereby declare that I am Vice President of State Telephone Company, Inc. (the "Company"); that I have read the forgoing "Petition for Expedited Waiver by State Telephone Company of Section 54.316(C) of the Commission's Rules" (the "Document"); and that contents of the Document with respect to the Company is true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of June, 2020.

Mark R. Evans
Vice President
State Telephone Company, Inc.

From: mevans@statetel.com [mailto:mevans@statetel.com]
Sent: Tuesday, March 12, 2019 12:23 PM
To: Stephen Snowman
Cc: makayla@statetel.com
Subject: RE: 54.316 Certification

Hi Stephen,

This is in follow to our conversation on Friday March 8th regarding State Telephone Company and our 54.316 certification in the HUBB portal. State Telephone Company is an ILEC serving approximately 4,500 customers and we have never had our present territory or customer locations GIS identified previously.

In the first certification we filed last year, for 2017, we had no new build out to report and provided certification to that effect. We received a Round 1 grant as part of the New NY Broadband Program awarded in 2016 with fiber optic construction commencing in late 2017 and continues to today with an anticipated completion date of March 31st 2019. As of this date all cable will be strung or buried, splicing should be complete and testing for several weeks after will occur.

Parts of the fiber build are complete and we first turned up new customers in June 2019 and have continued to turn up areas as they are lit up.

We realized last year at this time that we needed to obtain both a fiber mapping program and do GIS locating and they would go hand in hand. After several months of evaluating the vendors that could supply this service we chose the company Mapcom and signed a contract with them last June. Mapcom advised me that implementation time would be 6 months and they could also complete for us both the FCC 477 Form as well as the HUBB Certification.

Our staff has worked diligently with Mapcom since then to complete the project and be able to provide the HUBB certification. As our fiber build has occurred "as-built" mapping provided by our engineering Vantage Point has regularly been sent to Mapcom to update maps and insure accurate GIS locations. This process has been ongoing and I believe is entering the final stages which has caused our delay in getting HUBB certification done.

I assure everyone is working diligently to get this done. I am happy to provide a copy of the Mapcom contract and you may speak with the key people at State Telephone, Vantage Point or Mapcom if you wish to.

Please advise if you require any further information.

Thank-you.

Mark

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