

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Central Virginia Services, Inc.	)	WC Docket No. 09-197
	)	
Petition for Designation as an	)	
Eligible Telecommunications Carrier	)	
Pursuant to Section 214(e)(6) of the Act	)	

**PETITION FOR ELIGIBLE  
TELECOMMUNICATIONS CARRIER DESIGNATION**

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**PETITION FOR ELIGIBLE  
TELECOMMUNICATIONS CARRIER DESIGNATION**

Pursuant to section 214(e)(6) of the Communications Act of 1934 (“Act”), and section 54.202 of the rules of the Federal Communications Commission (“Commission”), Central Virginia Services, Inc. (“CVSI”) respectfully requests designation as an eligible telecommunications carrier (“ETC”) for a service area containing 1,524 census blocks in the State of Virginia. On August 28, 2018, the Commission announced the winning bidders for the Connect America Fund (CAF) Phase II auction.<sup>1</sup> CVSI is obligated to obtain ETC designation status within 180 days of the *Phase II Auction Closing Public Notice*,<sup>2</sup> and requests expeditious action so that it may meet this requirement.

**I. INTRODUCTION AND SUMMARY**

CVSI’s parent company, Central Virginia Electric Cooperative, Inc. (CVEC), is a member of the Rural Electric Cooperative Consortium, which was announced as a winning bidder for a number of locations in Virginia. Pursuant to the process established in the *Phase II Auction Closing Public Notice*, the Rural Electric Cooperative Consortium has assigned certain winning bids in Virginia to CVSI. CVSI will be the entity that files a long-form application for the census blocks listed in Exhibit A.

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<sup>1</sup> *Connect America Fund Phase II Auction (Auction 903) Closes, Winning Bidders Announced, FCC Form 683 Due October 15, 2018*, Public Notice, DA No. [18-887 (WTB/WCB rel. Aug. 28, 2018) (*Phase II Auction Closing Public Notice*).

<sup>2</sup> See 47 CFR § 54.315(b)(5).

CVSI is a wholly-owned direct subsidiary of CVEC, a non-profit electric distribution cooperative that has been providing electric services to the member/consumers in Virginia since 1937. CVEC serves 36,740 active accounts located in areas served by over 4,674 miles of electric lines in parts of 14 counties: Albemarle, Amherst, Appomattox, Augusta, Buckingham, Campbell, Cumberland, Fluvanna, Goochland, Greene, Louisa, Nelson, Orange, and Prince Edward.

CVSI will receive Connect America Fund support in portions of the CVEC electric service territory and adjacent areas in Albemarle, Amherst, Appomattox, Cumberland, Fluvanna, Goochland, Louisa, Nelson and Orange counties. Exhibit A is a list of the census blocks in Virginia for which CVSI seeks ETC designation from the Commission.<sup>3</sup>

CVSI will be a facilities-based provider that focuses on specific rural and remote areas within and adjacent to CVEC's electric service territory. CVSI's parent, CVEC, will construct and operate a new state-of-the-art fiber optic network to serve electric purposes and lease the excess capacity on that network to CVSI. CVSI will use that fiber network to provide voice and high-speed broadband Internet access services to CVEC's cooperative members throughout CVEC's electric service territory, which includes census blocks for which CVSI is seeking ETC designation. In addition to using the excess capacity on the CVEC-constructed fiber network within the CVEC electric service territory, CVSI will construct its own fiber optic plant to extend the network into adjacent non-electric service territory areas where it will provide service and receive CAF support.

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

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<sup>3</sup> See Exhibit A (List of Census Blocks in which CVSI Seeks Eligible Telecommunications Carrier Designation).

## II. THE COMMISSION HAS AUTHORITY TO GRANT THE ETC DESIGNATION REQUESTED BY CVSI

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.”<sup>4</sup> In the July 2018 *ETC Process Public Notice*, the Wireline Competition Bureau advised Phase II auction applicants, “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 Commission jurisdiction.”<sup>5</sup> Section 56-1.3 of the Code of Virginia provides in part that “[t]he [Virginia] Commission shall not have jurisdiction with respect to the regulation of Voice-over-Internet-protocol service, including but not limited to the imposition of regulatory fees, certification requirements, and the filing or approval of tariffs.”<sup>6</sup> Accordingly, under Virginia law, the Virginia State Corporation Commission lacks jurisdiction to designate CVSI as an ETC. Given the requirement that CVSI obtain ETC status within 180 days of the *Phase II Auction Closing Public Notice*, CVSI urges the Commission to act expeditiously on this request for ETC designation.

## III. CVSI MEETS THE STATUTORY AND REGULATORY REQUIREMENTS TO BE DESIGNATED AS AN ETC

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

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<sup>4</sup> 47 U.S.C. § 214(e)(6).

<sup>5</sup> *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, Public Notice, WC Dockets No. 09-197, 10-90, DA 18-714, at 2 (WCB rel. Jul. 10, 2018) (*ETC Process Public Notice*).

<sup>6</sup> VA Code Ann. § 56-1.3. *See also Application of BARConnects, LLC for Designation as an Eligible Telecommunications Carrier Pursuant to 47 U.S.C. §214(e)*, Case No. PUC-2015-00015, Order (Virginia State Corporation Comm., Mar. 30, 2015) (noting that Virginia SCC had not asserted jurisdiction over service providers like BARConnects, and that BARConnects should seek designation from the FCC).

A. CVSI Will Provide Service as a Common Carrier

In the areas where CVSI receives ETC designation, CVSI will provide interconnected Voice over Interconnected Protocol (VoIP) service on a common carrier basis. As such, CVSI certifies that it is a common carrier under sections 214(e)(1) and 214(e)(6) of the Act.<sup>7</sup>

B. CVSI Will Offer the Services Supported by the Federal Universal Service Support Mechanisms

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.<sup>8</sup> As described below, CVSI certifies that it will provide the following services that are supported by the federal universal service support mechanisms.<sup>9</sup>

1. Voice Telephony – CVSI will offer interconnected VoIP service on a stand-alone basis using a third-party vendor, Momentum.<sup>10</sup> CVSI will be legally responsible for dealing with customer problems and for providing service consistent with the Commission’s universal service requirements.

This service will include minutes of use for local service provided at no charge to end users (specifically, CVSI’s service plans will offer unlimited usage within the U.S.) and access to emergency services via 911 or E-911. CVSI will not distinguish between the pricing of toll and non-toll calls in the pricing of its voice service, and accordingly it is not obligated to provide toll limitation services to qualifying low-income consumers.<sup>11</sup>

2. Broadband Internet Access Services – CVSI’s broadband Internet offering will provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any

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<sup>7</sup> See Exhibit B (Affidavit of Gary E. Wood, Chief Executive Officer, Central Virginia Services, Inc.) (“Wood Affidavit”).

<sup>8</sup> 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) (*USF/ICC Transformation Order* and/or *FNPRM*), *aff’d sub nom. In re: FCC 11-161*, 753 F.3d 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).

<sup>9</sup> See Exhibit B (Wood Affidavit).

<sup>10</sup> See *ETC Process Public Notice* at 5 (“a broadband provider may satisfy its voice obligation by offering voice through an affiliate or by offering a managed voice solution (including VoIP) through a third-party vendor”).

<sup>11</sup> 47 CFR § 54.401(a)(2).

capabilities that are incidental to and enable the operation of the communications service.

CVSI plans to offer Internet service at download speeds of either 100 Mbps for \$49.99 or \$59.99 per month, or 1 Gbps for \$79.99 or \$89.99 per month, depending on customer location. CVSI will offer standalone voice telephony for \$34.99 per month.

CVSI commits to provide these services consistent with the Commission's high-cost universal service support rules applicable to it.<sup>12</sup> In addition, CVSI will offer Lifeline discounts to qualifying low-income consumers consistent with the Commission's Lifeline rules in the census blocks where CVSI is authorized to receive CAF Phase II support.<sup>13</sup>

CVSI possesses the financial and technical capability to provide the supported services. CVSI incorporates by reference the information and certifications that it will make in its FCC Form 683 long form application for CAF Phase II support.<sup>14</sup>

CVSI 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 will make in its FCC Form 683 application for Phase II support.<sup>15</sup>

CVSI further certifies that its fiber optic network will have the ability to remain functional in emergency situations, will provide 8 hours of battery back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities, and will be capable of managing traffic spikes resulting from emergency situations. CVSI's fiber optic network will support

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<sup>12</sup> See 47 CFR §§ 54.101(c), 54.309.

<sup>13</sup> See *id.* § 54.101(d); *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 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).

<sup>14</sup> *ETC Process Public Notice* at 5.

<sup>15</sup> See 47 CFR. § 54.309.

telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including 911 services.

C. CVSI Will Provide Service Using Its Own Facilities

CVSI will be a facilities-based broadband Internet access and VoIP services provider. CVSI's parent, CVEC, is in the process of constructing the first segment of its fiber optic network (for electric purposes) and will lease the excess capacity in those fiber facilities to CVSI.<sup>16</sup> As noted above, CVSI plans to offer interconnected VoIP service to its end user customers pursuant to an agreement with a third-party vendor, Momentum Telecom.

D. CVSI Will Provide Service Throughout Its Designated Service Area

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

E. CVSI Will Advertise the Availability of Its Services and Charges Using Media of General Distribution

CVSI will advertise the availability of, and charges for, its supported service offerings using media of general distribution, and will undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements. CVSI will offer and advertise its voice and broadband services through direct mailing and is considering advertisements through other media, such as radio, newspapers, high school football programs, and booths at community fairs.

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<sup>16</sup> 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.").



IV. ANTI-DRUG ABUSE CERTIFICATION

CVSI certifies that neither the petitioner nor any party to the 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.<sup>17</sup>

V. CONCLUSION

For all of the foregoing reasons, CVSI respectfully requests that the Commission designate it as an ETC so that CVSI will be eligible for CAF Phase II support in the areas set forth in Exhibit A.

Respectfully submitted,

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<sup>17</sup> 47 CFR § 1.2002; *see* Exhibit B (Wood Affidavit).

**EXHIBIT A**

**LIST OF CENSUS BLOCKS IN WHICH CVSI SEEKS  
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

census block_id	county_name	census block group_id
510030101001015	Albemarle	5100301010001
510030104012003	Albemarle	510030104012
510030104012005	Albemarle	510030104012
510030104012014	Albemarle	510030104012
510030104012067	Albemarle	510030104012
510030104012068	Albemarle	510030104012
510030104012069	Albemarle	510030104012
510030104012071	Albemarle	510030104012
510030104012075	Albemarle	510030104012
510030104012076	Albemarle	510030104012
510030104012077	Albemarle	510030104012
510030104012079	Albemarle	510030104012
510030104012080	Albemarle	510030104012
510030104012081	Albemarle	510030104012
510030104012082	Albemarle	510030104012
510030104012083	Albemarle	510030104012
510030104012084	Albemarle	510030104012
510030104012085	Albemarle	510030104012
510030104012087	Albemarle	510030104012
510030104012089	Albemarle	510030104012
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510030112011036	Albemarle	510030112011
510030112011039	Albemarle	510030112011
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510030112011056	Albemarle	510030112011
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510030112011087	Albemarle	510030112011
510030112011112	Albemarle	510030112011
510030112011113	Albemarle	510030112011
510030112011121	Albemarle	510030112011
510030112011122	Albemarle	510030112011
510030112011123	Albemarle	510030112011
510030112011135	Albemarle	510030112011
510030112011136	Albemarle	510030112011
510030112011140	Albemarle	510030112011
510030112011143	Albemarle	510030112011

510030112012011	Albemarle	510030112012
510030112012013	Albemarle	510030112012
510030112012014	Albemarle	510030112012
510030112012062	Albemarle	510030112012
510030112012065	Albemarle	510030112012
510030112012070	Albemarle	510030112012
510030112012086	Albemarle	510030112012
510030112012087	Albemarle	510030112012
510030112012089	Albemarle	510030112012
510030112013067	Albemarle	510030112013
510030112013068	Albemarle	510030112013
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510030112013071	Albemarle	510030112013
510030112013075	Albemarle	510030112013
510030112013078	Albemarle	510030112013
510030112013079	Albemarle	510030112013
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510030112013135	Albemarle	510030112013
510030114003116	Albemarle	510030114003
510030114004105	Albemarle	510030114004
510030114004106	Albemarle	510030114004
510030114004109	Albemarle	510030114004
510090101002002	Amherst	510090101002
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510090101002009	Amherst	510090101002
510090101002014	Amherst	510090101002
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510090101002026	Amherst	510090101002
510090101002029	Amherst	510090101002
510090101002034	Amherst	510090101002
510090101002037	Amherst	510090101002
510090101002038	Amherst	510090101002
510090101002039	Amherst	510090101002
510090101002042	Amherst	510090101002
510090101002043	Amherst	510090101002
510090101002047	Amherst	510090101002
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510090101002051	Amherst	510090101002
510090101002055	Amherst	510090101002
510090101002057	Amherst	510090101002
510090101002064	Amherst	510090101002
510090101002068	Amherst	510090101002
510090101002073	Amherst	510090101002
510090101002080	Amherst	510090101002
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**EXHIBIT B**

**AFFIDAVIT OF GARY E. WOOD  
CHIEF EXECUTIVE OFFICER OF CENTRAL VIRGINIA SERVICES, INC.**

**AFFIDAVIT OF GARY E. WOOD**

COMMONWEALTH OF VIRGINIA

) SS.

COUNTY OF NELSON


Gary E. Wood, 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 the Chief Executive Officer of Central Virginia Electric Cooperative ("CVEC") and its wholly-owned direct subsidiary, Central Virginia Services, Inc. ("CVSI"). Acting on behalf of CVEC and CVSI, 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 my belief.
3. CVSI certifies that it is a common carrier under sections 214(e)(1) and 214(e)(6) of the Communications Act of 1934 ("Act").
4. CVSI commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier in the Census Blocks described in the Petition.
5. CVSI 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 CVSI's use of federal high-cost support.
7. CVSI will use the federal high-cost support that it receives only to provide, construct, upgrade, and maintain facilities and services for which the support is intended.



8. CVSI 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.

Gary E. Wood

  
Chief Executive Officer  
Central Virginia Services, Inc.

NOTARY

State of Virginia

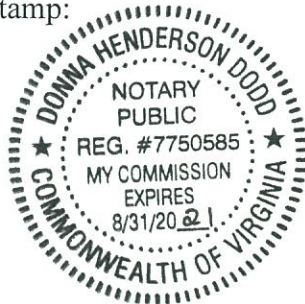
County of Nelson

This record was acknowledged before me on 24, Sept. 2018 (date)

By Gary E. Wood (name(s) of individual(s)).

Notary signature Donna Henderson Dodd

Stamp:



My commission expires: 8/31/2021