

PETITION FOR ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION

'Telecommunications Provider CPG Registration' filed as case 21-0033-TELCOCPG

1. General company information:

- a. Pear Networks LLC d/b/a Kingdom Fiber
- b. Operates in State of Vermont
- c. Seeking ETC Status in State of Vermont
- d. Year Founded: 2014
- e. Brief History of Company / General Background Information:
Kingdom Fiber was founded and is operated by its sole owner, Michael Birnbaum, the 15-year manager and partner at Cloud Alliance, a Vermont wireless ISP. Following five years of development, Kingdom Fiber first provided retail service in 2019 in cooperation with the Town of Craftsbury. Kingdom Fiber assisted the Town in finding federal funding to build a municipal fiber network and developed some novel, economical approaches to passive optical network technology. The company is now poised to have a major impact in the northeastern and central parts of Vermont, with new partners investing in significant expansion, following success in the FCC RDOF Phase I auction.
- f. Signatory Name: Michael Birnbaum
- g. Signatory Address: 311 Woodcock Rd, Plainfield VT 05667
- h. Signatory Phone: (802) 272-1027
- i. Signatory Email: mb@kfiber.net

2. Has Company been granted ETC status previously?

No previous ETC status in any state.

3. Is Company a Common Carrier?

Kingdom Fiber will be a common carrier by virtue of its provision of interconnected VoIP service on a common carrier basis. As such, Kingdom Fiber certifies that it is a common carrier under Section 214(e)(1) of the Telecommunications Act of 1996 ("the Act")

4. Will Company offer services using company-owned facilities or a combination of company-owned facilities and the resale of another carrier's services?

With 185 miles of leased fiber networks and 2 miles of its own, Kingdom Fiber certifies that it will be a facilities-based broadband Internet access and VoIP services provider. Kingdom Fiber may deploy some fixed wireless access and will deploy hundreds of miles of new fiber-based passive optical network, contracting with hosting service voip.ms to offer interconnected VoIP service over its network.

5. Customer information:

- a. Total Number of Customers: 124
- b. Total Number of Voice Customers: 0
- c. Total Number of Broadband Customers: 124

6. Does Company offer voice grade access to the public switched network ("PSTN") or its functional equivalent?

Kingdom Fiber will provide its customers with voice grade access to the Public Switched Telephone Network ("PSTN") through its interconnected Crystal VoiceSM VoIP service provided by hosting service voip.ms.

7. Does Company offer broadband internet access service?

Kingdom Fiber currently offers True BroadbandSM high-speed Internet access. With its fiber optic network, Kingdom Fiber is a facilities-based provider that focuses on specific rural and remote areas within or adjacent to multiple Vermont utilities' electric service territories.

8. Please list Company's offerings for voice and broadband including any voice/broadband bundles or standalone voice offerings.

Kingdom Fiber's broadband data throughput plans are all downstream and upstream symmetrical. Voice service includes unlimited minutes in the continental US and Canada. Voice plans are discounted \$40/month when bundled with broadband data plans.

9. Please provide service and rate plans.

K/FiberNet SM 10	10/10Mbps	\$59/month
K/FiberNet SM 25	25/25Mbps	\$79/month
K/FiberNet SM 50	50/50Mbps	\$99/month
K/FiberNet SM 100	100/100Mbps	\$149/month
K/FiberNet SM 250	250/250Mbps	\$249/month
K/FiberNet SM 500	500/500Mbps	\$349/month
K/FiberPhone SM ONE	one line (standalone)	\$69/month
K/FiberPhone SM ONE	one line (bundled)	\$29/month
K/FiberPhone SM TWO	two lines (bundled)	\$49/month
K/FiberPhone SM BIZ	two lines (bundled)	\$59/month

10. When will you initiate voice and broadband service?

Kingdom Fiber offers broadband service now and intends to begin offering voice service in the second quarter of 2021.

11. Will Company offer Lifeline?

Kingdom Fiber's supported Lifeline service offering will provide voice grade access to the PTSN through its provision of resold VoIP services from voip.ms. This service will include minutes of use for local service provided at no additional charge to eligible consumers (plans are generally unlimited usage within the continental U.S. and Canada). Kingdom Fiber will offer Lifeline voice and broadband service to qualifying low-income consumers pursuant to the Federal Communications Commission's Lifeline rules.

12. Does Company enable 911 and E911 access for all of its customers?

Kingdom Fiber's VoIP service offering will provide consumers with access to 911 and enhanced 911 to the extent local governments have implemented such services. Kingdom Fiber will primarily rely on its contractual arrangement with voip.ms to provide such emergency services to consumers.

13. Will you offer any type of toll limitation service to low-income consumers, and if so, will it be offered at no charge?

The VoIP service domestic offerings provided by voip.ms will not distinguish between toll and non-toll calls. Accordingly, Kingdom Fiber is not required to provide toll limitation services and, currently has no plans to offer this service.

14. Please describe ways in which Company will advertise the availability and rates for the services described above?

Pursuant to Section 214(e)(1) of the Act, Kingdom Fiber 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 consistent with all applicable requirements. Specifically, Kingdom Fiber will utilize outreach materials and methods designed to reach households that currently do not have telephone service and those likely to qualify for the service. Additionally, Kingdom Fiber will coordinate its outreach efforts with relevant government agencies and other local groups.

Kingdom Fiber will use the appropriate media outlets to advertise its universal service offerings in a manner consistent with applicable requirements. Advertising will include, but not be limited to, targeted direct mail, advertisements in daily and weekly print periodicals, and online outlets. Kingdom Fiber will also coordinate with relevant state agencies, community outreach organizations, and non-profit organizations to make information regarding supported service offering available in their respective resource guides, other printed materials, and offices. Kingdom Fiber will also advertise through online search engines.

15. Please describe the specific areas / census block groups in which Company is seeking ETC Designation.

In fulfillment of its RDOF obligations, no later than the FCC requires, Kingdom Fiber will serve the following 27 census block groups (36 towns and gores in four northern Vermont counties) as an ETC:

500059570002	Caledonia	Walden
500059572002	Caledonia	Lyndon
500059573001	Caledonia	Lyndon
500059574001	Caledonia	Saint Johnsbury
500059576001	Caledonia	Danville
500059577002	Caledonia	Hardwick
500059578002	Caledonia	Groton
500099501001	Essex	Norton/Averill/Averys Gore/Warners Grant/Warrens Gore Lewis/Brunswick/Lemington/Maidstone/Ferdinand/Bloomfield
500099502001	Essex	Brighton
500099505002	Essex	Concord
500099505003	Essex	Lunenburg
500199511001	Orleans	Holland/Morgan
500199512002	Orleans	Derby
500199516002	Orleans	Newport Town
500199517003	Orleans	Albany
500199517004	Orleans	Craftsbury
500199518001	Orleans	Barton
500199518002	Orleans	Barton
500199518003	Orleans	Barton
500199519001	Orleans	Coventry
500199519002	Orleans	Brownington/Westmore
500199520002	Orleans	Greensboro
500239540001	Washington	Cabot
500239540003	Washington	Plainfield
500239541003	Washington	Calais
500239542002	Washington	Middlesex
500239550001	Washington	East Montpelier

16. Can Company meet or exceed the minimum service standards for Lifeline-supported services?

Pursuant to Section 54.202(a)(3) of the FCC's rules, Kingdom Fiber certifies that it will prioritize complying with all applicable consumer protection and service quality standards to satisfy this requirement.

17. Please describe in detail Company's ability to remain functional in emergency situations.

Kingdom Fiber certifies that its fiber optic network will have the ability to remain functional in emergency situations and fulfill the applicable requirements. Kingdom Fiber also certifies that its fiber optic network will support telephone service using VoIP technology and will support all phone features, including 911 services.

Kingdom Fiber will modify network routing and weighting as needed to reroute traffic around damaged facilities. Traffic management capabilities and adequate capacity will also allow Kingdom Fiber to manage traffic spikes throughout its network, as emergency situations require. Kingdom Fiber has established reasonable provisions to meet emergencies resulting from failures of lighting or power service, sudden and prolonged increases in traffic, illness of operators or from fire, storm, or acts of God.

Kingdom Fiber's network facilities will also have off-grid backup power available from its battery banks at each hub and backup generator systems. Therefore, Kingdom Fiber's system will provide network facilities sufficient availability of backup power. This system will ensure functionality without an external power source. Additionally, Kingdom Fiber will include provisions to supply a reasonable amount of battery service at voice subscribers' premises.

Kingdom Fiber has informed employees as to the procedures to be followed, including reasonable rerouting of traffic around damaged facilities and the deployment of emergency power in the event of emergency to prevent or mitigate interruption or impairment of telecommunications service.

Finally, Kingdom Fiber's contract arrangement with voip.ms will impose certain obligations on voip.ms to keep Kingdom Fiber's supported service offering functional during emergency situations.

18. Is Company financially and technically capable of providing supported services?

With its new equity partners, Kingdom Fiber will have the requisite financial capabilities to underwrite its share of construction and start-up expenses to get its fiber optic network built and to expand operations in the internet and VoIP business. If granted ETC status, Kingdom Fiber certifies that it will provide the Commission with updated progress reports throughout the build.

There has been significant private equity sponsor interest in the fiber-to-the-premises marketplace, especially since the beginning of the COVID-19 pandemic placed an extreme demand on building high-speed internet access throughout rural areas. Also, government subsidies and grants are increasing confidence that these businesses—once thought to be economically prohibitive—are actually attractive for private equity investment. They are now viewed as the new important infrastructure projects and are gaining a similar type of investor as traditional water, sewer, gas and toll highway projects have in the past. This attracts low-cost capital and significant investment partnership capacity for teams that have proven their ability to serve customers and can scale their operations to serve regions.

Kingdom Fiber already offers high-speed broadband Internet services using fiber-optic networks and will resell VoIP services purchased from voip.ms. As stated, Kingdom Fiber will repackage the VoIP services purchased and offer the services over Kingdom Fiber's own fiber network. A large, continental provider, voip.ms provides wholesale VoIP services to numerous resellers. Kingdom Fiber's partnership with voip.ms further demonstrates Kingdom Fiber is technically capable of providing supported services.

19. Have you received funding from other federal or state programs?

Kingdom Fiber has received funding from the Vermont Department of Public Service Connectivity Initiative both in 2016 and 2018 and a DPS Broadband Initiative Grant in 2020. Kingdom Fiber is a \$7.475M auction winner in the FCC Rural Digital Opportunity Fund Phase I auction in the census block groups listed in #15, above.

20. Has Company been subject to any enforcement actions?

Kingdom Fiber has never been subject to any enforcement actions.

21. How would being designated as an ETC promote public interest in the proposed service areas?

Designation of Kingdom Fiber as an ETC serves the public interest by enabling Kingdom Fiber to offer voice and broadband services, including to low income households that qualify for Lifeline benefits, as the company brings high-speed broadband Internet and VoIP services to underserved locations in the Designated Service Area. Kingdom Fiber has been an active member in its community and has been committed to supporting numerous efforts to help its region grow and prosper. Kingdom Fiber is determined to make it easier for consumers located within the Designated Service Area to receive affordable telecommunications and high-speed broadband Internet services that are comparable to those enjoyed by other customers.

Kingdom Fiber understands that access to voice services and high-speed broadband Internet services will attract more businesses and residents to the area, creating better jobs and allowing families to enjoy a decent lifestyle.

Our Vision: We believe in the resourcefulness and creativity of our neighbors in the Northeast Kingdom and central Vermont. With unfettered, lightning-fast access to the world's markets and culture, new economic, educational, and cultural developments will emerge here organically. This crucial piece of 21st century infrastructure will help citizens of the region prosper and schools and cultural institutions thrive. Our towns will grow, as more of our young people will find opportunities to make their livings here.

Submitted by:

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