

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 21-0049-PET

Petition of East Central Vermont Telecommunications District)
for designation as an Eligible Telecommunications Carrier)

**SUPPLEMENT TO PETITION OF
EAST CENTRAL VERMONT TELECOMMUNICATIONS DISTRICT
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER**

East Central Vermont Telecommunications District d/b/a ECFiber (“ECFiber”) through its attorney, Montroll, Backus & Oettinger P.C., hereby supplements its petition (the “Petition”) to the Vermont Public Utility Commission, dated January 6, 2021 for designation as an eligible telecommunications carrier (“ETC”). The purpose of this supplement is to clarify the areas in which ECFiber seeks to be designated as an ETC and ECFiber’s obligations within such designated areas.

As explained in Petition, ECFiber has been allocated Rural Digital Opportunity Fund (“RDOF”) Phase I support as a winner in the FCC’s RDOF Phase I auction (“Auction 904”). The RDOF grant is awarded based upon census blocks and in accordance with the terms of the RDOF grant, ECFiber is required to build out its network to be capable of serving all customers within the awarded census blocks within six years of the award. To be clear, ECFiber has not yet completed the buildout of its network within the designated census blocks. That is the purpose of the RDOF grant – to help provide ECFiber with the financial resources so that it has the ability to complete such buildout.

In addition, the RDOF grant requires that ECFiber seek designation as an ETC in all areas covered by the grant. Accordingly, as stated in paragraph 6 of the Petition,

ECFiber is seeking to be designated an ETC within all of the census blocks where ECFiber has been allocated RDOF Phase I subsidies. ECFiber identified the applicable census blocks within Attachment A of the Petition.

In follow-up discussions with the Vermont Department of Public Service (“DPS”), the DPS expressed a desire to have ECFiber’s ETC designation be based on whole towns, as opposed to census blocks.

ECFiber is amenable to expanding its request for ETC designation to include all of ECFiber’s member municipalities. These towns are listed in first part of Attachment D hereto. Also shown in Exhibit D are the RDOF census blocks that correspond to these towns.

However, ECFiber’s RDOF grant also includes census blocks that are located in four towns that are not part of ECFiber’s member municipalities. These non-ECFiber towns are Bridgewater, Barre, Northfield and Roxbury. Because ECFiber lacks funding to build its network in those four towns other than through the RDOF grant, it may not be financially feasible for ECFiber to build its network in these four non-ECFiber towns outside of the RDOF census blocks, particularly to some of the more remote areas of those towns with few potential customers.

Accordingly, with regard to the four towns that are not part of ECFiber, ECFiber can only commit to providing services to households that are located within the awarded RDOF census blocks -- ECFiber cannot commit to being able to serve customers outside of the RDOF census blocks in those four towns , even if it is designated as an ETC for those towns. To that end, if ECFiber will not be required to provide services to

customers in the four non-ECFiber towns of Bridgewater, Barre, Northfield and Roxbury who are located outside of the designated RDOF census block, then ECFiber would expand the area for which it is seeking to be designated an ETC from just the RDOF designated census blocks as shown in Attachment A of the Petition, to the whole towns as well, as shown in the second part of Attachment D hereto.

In addition, ECFiber seeks to clarify a related point from its Petition. ECFiber is still in the process of building out its network in its member towns. Likewise, as stated above, a condition of the RDOF grant is that ECFiber is required to build out its network within six years of the financial award in order to be capable of serving all of the households inside of the designated census blocks. Accordingly, while ECFiber is seeking to be designated an ETC and is committed to being able to provide service to all who seek it, ECFiber may not complete its network within those census blocks for up to six years. As such, ECFiber respectfully requests that it be given up to six years (to match of the conditions of the RDOF grant) to complete the buildout of its network.

Conclusion

WHEREFORE, for all of the foregoing reasons and those stated in the Petition, ECFiber respectfully requests that the Vermont Public Utility Commission grant this petition and designate East Central Vermont Telecommunications District d/b/a ECFiber as an ETC for the service territory specified herein.

DATED at Burlington, Vermont, this 24th day of March, 2021.

East Central Vermont Telecommunications District



By: _____

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Attachment D

**List of ECFiber Towns in Which ECFiber Seeks ETC Designation
 With Census Block Groups Included in the RDOF Grant**

ECFiber Town	RDOF Census Blocks within ECFiber Town		
Barnard	None		
Bethel	500279652001		
Bradford	500179598002		
Braintree	500179593002		
Brookfield	500179593001		
Chelsea	500179595002		
Corinth	500179591022		
Fairlee	500179597002		
Granville	None		
Hancock	None		
Hartford	500279655013	500279655021	500279656003
Newbury	500179590001	500179590002	
Norwich	500279650001	500279650002	
Pittsfield	None		
Pomfret	None		
Randolph	500179594001	500179594002	500179594003
Reading	500279659003		
Rochester	500279652002*		
Royalton	500279651002	500279651003	
Sharon	500279654001		
Stockbridge	None		
Strafford	500179595004		
Thetford	None		
Topsham	500179591021		
Tunbridge	500179595003		
Vershire	500179595001		
Washington	500179591011		
West Fairlee	500179597001		
West Windsor	500279659004		
Windsor	500279660004		
Woodstock	500279658001	500279658002	

*Also located in
 the Town of
 Bethel

**List of Non-ECFiber Towns in Which ECFiber Seeks ETC Designation
With Census Block Groups Included in the RDOF Grant**

Non-ECFiber Town	RDOF Census Blocks
Bridgewater	500279659001
Barre	500239554003
Northfield	500239555001
Roxbury	500239555002