

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 21-0018-PET

Petition of Starlink Services, LLC for designation as an Eligible Telecommunications Carrier for purposes of receiving Rural Digital Opportunities Fund support
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STARLINK SERVICES, LLC’S
ETC MARKTING PLAN

Starlink Services, LLC (“Starlink”), which was designated as an Eligible Telecommunications Carrier (“ETC”) in Vermont by Order of the Public Utility Commission (“Commission”) dated May 3, 2021 (the “Order”), hereby submits its ETC marketing plan in compliance with the Commission’s Order.

1. Background

On May 3, 2021, the Commission designated Starlink as an ETC, pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended,¹ for purposes of receiving federal support through the Rural Digital Opportunities Fund.² In its Order, the Commission found that Starlink satisfies the requirements under federal law for designation as an ETC, namely,

that it offers “voice telephony service,” which includes four supported services: (1) voice-grade access to the public switched telephone network (“PSTN”) or its functional equivalent; (2) minutes of use for local service provided at no additional charge to end users; (3) access to emergency services; and (4) toll limitation services to qualifying low-income consumers. The ETC must also advertise the availability of and charges for these services using media of general distribution.³

¹ 47 U.S.C. § 214(e)(2)).

² See *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced*, 2021, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, Public Notice, DA 20-1422, (Fed. Commun. Comm’n, rel. Dec. 7, 2020), available at https://docs.fcc.gov/public/attachments/DA-20-1422A1_Rcd.pdf.

³ Order, at 3 & 12; see 47 C.F.R. § 54.101(a)-(b).

The Commission conditioned its designation, in part, on Starlink's satisfaction of the following requirements:

Within 60 days of this order, [Starlink] shall file a marketing plan that describes the marketing and outreach efforts that the Company will use in advertising the availability of the required services, and explain how those efforts will be effective in reaching eligible consumers. Specifically, the marketing plan shall describe:

- i. whether information about the required services is clearly displayed on the Company's website;
- ii. the Company's use of multiple outreach methods;
- iii. the frequency of the Company's outreach efforts;
- iv. whether the Company will provide outreach materials to relevant community institutions;
- v. whether the Company will advertise in multiple languages, if appropriate;
- vi. the Company's use of clear and plain language when describing the required services; and
- vii. possible cooperation between the Company and other ETCs for the joint production, placement, and use of outreach materials.⁴

2. ETC Marketing Plan

a. Satisfaction of FCC Obligations

Starlink makes the following initial representations regarding its obligations under Federal Communications Commission ("FCC") rules to advertise and publicize the availability of ETC supported services for Starlink customers in Vermont.

1. Starlink will comply with the advertising requirement of 47 C.F.R. § 54.201(d)(2).

⁴ Order, at 12-13.

2. Starlink will also comply with the requirement to publicize the availability of Lifeline services under 47 C.F.R. § 54.405(b).

b. Satisfaction of Vermont Commission Obligations

With respect to the specific marketing and outreach requirements set forth in the Commission's Order, Starlink represents that it will satisfy each of those requirements as shown in the table below.

	Elements of ETC Marketing & Outreach Plan	Starlink Response
I	Whether information about the required services is clearly displayed on the Company's website	Starlink will publish clear and detailed information about the ETC supported services on its website.
II	The Company's use of multiple outreach methods	Starlink will use multiple outreach methods to advertise the availability of its ETC and Lifeline services. Starlink is analyzing the most effective methods of reaching potential subscribers within its RDOF territories and considering a variety of channels including online advertising, radio advertising, direct mail, and partnering with community-based organizations that have a presence on both the national and local level. Importantly, when Starlink initiates service in Vermont, Starlink will evaluate the success of its outreach efforts and adjust the marketing plan as appropriate to support awareness of these services in our Vermont communities.
III	The frequency of the Company's outreach efforts	In accordance with guidance from the Universal Service Assistance Company, this outreach will occur at least annually, but as we evaluate the effectiveness of different channels, we will adjust both frequency and medium to help drive awareness of our services in our Vermont communities.
IV	Whether the Company will provide outreach materials to relevant community institutions	As noted above, Starlink is exploring partnerships with local community-based organizations in an effort to help ensure information about our services reaches eligible residents of the communities we serve. This would include the placement of posters or other print materials at appropriate locations within these organizations where potential subscribers, including low-income subscribers, are likely to visit.
V	Whether the Company will advertise in multiple languages, if appropriate	Yes, our objective is to provide in the languages that are appropriate for the community being served in order to facilitate awareness of the Starlink offering.
VI	The Company's use of clear and plain language when describing the required services	Starlink will describe its broadband offering using common and simple performance metrics (e.g., 100 Mbps download / 20 Mbps upload). Its voice offering,

		which will be a VoIP product, will similarly be described based on typical metrics (e.g., unlimited vs. a set number of minutes). For Lifeline, Starlink expects to use language similar to that shown in Attachment 'A' .
VII	Possible cooperation between the Company and other ETCs for the joint production, placement, and use of outreach materials	Starlink is happy to explore cooperative outreach efforts with other ETCs in Vermont.

c. Effectiveness of Starlink's Outreach Efforts

Starlink is evaluating the most effective means to reach potential subscribers within its RDOF territories. As noted above, Starlink will use a multi-pronged outreach approach focused on direct marketing and local community-based organizations. As necessary, Starlink will also consider other traditional mass-market media in Vermont. Starlink expects this multi-pronged approach to be effective in reaching the potential subscribers in its RDOF territories, including those who are low-income, and plans to refine its outreach efforts over time based on their effectiveness. Starlink intends to advertise its services in full compliance with all federal and Vermont rules and orders governing Lifeline service.

DATED at Burlington, Vermont, this 28th day of June, 2021.

Respectfully submitted,

STARLINK SERVICES, LLC

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ATTACHMENT 'A'
Sample Advertising Language for ETC and Lifeline Services

Federal Lifeline Program

Starlink Services LLC (Starlink) offers a Lifeline Program for eligible low-income residential subscribers at their primary residence.

Eligible subscribers can apply the monthly federal Lifeline discount to a voice service, to a qualifying Internet service, or to a qualifying bundled service that includes Internet and voice service. The following Lifeline discounts are available to eligible subscribers:

Service Types and Monthly Benefit Amount

- **Voice** (voice-only service that meets minimum service standards): \$5.25
- **Broadband** (broadband-only service that meets minimum service standards): \$9.25
- **Bundled voice and broadband** (voice and broadband service that meets both the voice and broadband minimum service standards): \$9.25

Lifeline is a government benefit assistance program and is available only to eligible subscribers who qualify through their participation in other government programs or through income. Lifeline is a non-transferrable service and is limited to one Lifeline discount per household.

Visit the Universal Service Administrative Company at www.usac.org for more information on the Lifeline Program.

How do I apply?

To receive the Lifeline Program discount, residential subscribers must establish the eligibility of their households. Eligibility requirements are explained in detail on the Lifeline Program application. If you meet the eligibility requirements, complete and sign the application form, attach proof of eligibility, and mail directly to Starlink.

[Lifeline Application](#)