

**Before the  
Tennessee Public Utility Commission**

In the Matter of	)	
	)	
Aeneas Communications, LLC	)	Docket No. <u>21-00002</u>
	)	
Petition for Amendment to Existing	)	
Designation as an	)	
Eligible Telecommunications Carrier	)	
Pursuant to Section 214(e)(2) of the Act	)	

**PETITION FOR AMENDMENT TO EXISTING DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER**

Pursuant to section 214(e)(2) of the Communications Act of 1934 (“Act”) and the rules of the Tennessee Public Utility Commission, (“Commission”), Aeneas Communications, LLC (“Aeneas” or “Company”) respectfully requests an amendment to its existing designation as a high-cost eligible telecommunications carrier (“ETC”) in the State of Tennessee to include census blocks in certain winning bids in the recent Federal Communications Commission’s (“FCC”) Rural Digital Opportunity Fund (“RDOF”) Phase I auction, and to be designated as a Lifeline-only ETC for additional areas within the electric service territory of its parent, Southwestern Tennessee Electric Membership Corporation (“STEMC”), as more fully described below.

Aeneas is an existing ETC in the State of Tennessee, having previously received its designation from the Commission in 2008 in order to receive federal universal service support in a service area comprised of the west Tennessee service area of AT&T.<sup>1</sup> Aeneas is filing this petition in order to enlarge the service area of its existing ETC designation and to become a Lifeline-only ETC in additional areas in Tennessee in order to better serve its customers.

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<sup>1</sup> *In re: Petition of Aeneas Communications, LLC for Designation as an Eligible Telecommunications, Order Designating Aeneas Communications, LLC as an Eligible Telecommunications Carrier*, Docket No. 08-00059 (2008).

On December 7, 2020, the FCC announced the winning bidders for the RDOF Phase I auction.<sup>2</sup>

As receipt of FCC funding is contingent upon the grant of the Company's request to enlarge the geographic scope of its existing ETC designation, Aeneas respectfully requests that the Commission expeditiously review and approve this Application in order to accelerate the deployment of critical broadband and voice services in the eastern portion of Chester County, Tennessee. Aeneas is obligated to submit to the FCC documentation of its ETC designation within 180 days of the *RDOF Auction Closing Public Notice* in order to be authorized to receive RDOF support in this area,<sup>3</sup> and it therefore requests action on this Petition before June 7, 2021, in order to meet this FCC deadline.

## I. BACKGROUND

### A. The Company

Aeneas is a provider of communications services headquartered in Jackson, Tennessee. Founded in 1995 as Aeneas Internet Services, Aeneas was the first company to bring Internet to rural Tennessee, and soon after its creation became West Tennessee's largest Internet provider.

In 1999, Aeneas expanded into the telephone industry as Aeneas Internet and Telephone when it became Tennessee's first Tennessee-owned, facilities-based competitive local exchange carrier ("CLEC"), authorized to provide services throughout the state. Aeneas offers services through a combination of its own facilities and resale arrangements with other carriers, providing competitive local telecommunications, long distance telecommunications, high-speed Internet, and Voice over Internet Protocol ("VoIP") services, primarily in western Tennessee. Aeneas currently offers services in Bedford, Benton, Carroll, Cheatham, Chester, Coffee, Crockett, Davidson, Decatur, Dickson, Dyer, Fayette, Franklin, Gibson, Giles, Hardeman, Hardin, Haywood, Henderson, Henry, Hickman, Humphreys, Lake, Lauderdale, Lawrence, Lewis, Lincoln, Madison, Marshall, Maury, McNairy, Montgomery, Moore,

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<sup>2</sup> *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced*, Public Notice, DA No. 20-1422 (OEA/WCB rel. Dec. 7, 2020) (*RDOF Auction Closing Public Notice*).

<sup>3</sup> See 47 CFR § 54.315(b)(5).

Obion, Robertson, Rutherford, Shelby, Smith, Stewart, Sumner, Tipton, Trousdale, Weakley, Williamson, and Wilson counties, Tennessee.

In 2017, Aeneas began construction of a new fiber-to-the-premise broadband network. Subsequently, in 2019, Aeneas was acquired by STEMCO, a member-owned, non-profit electric distribution cooperative with headquarters in Brownsville, Tennessee. STEMCO provides electric service over more than 4,000 miles of electric distribution line to portions of 11 counties in western Tennessee: Mason, Stanton, Munford, Atoka, Brighton, Covington, Gallaway, Whiteville, Mercer, Pinson and Henderson. STEMCO was incorporated in 1936 and currently has approximately 45,000 members. Aeneas is a wholly-owned subsidiary of STEMCO.

After the acquisition, STEMCO and Aeneas announced plans to build and expand a gigabit fiber network to eventually bring broadband communications to every consumer-member in STEMCO's service area. Construction of nearly 1,000 miles of fiber optic cable began in the spring of 2020.

Aeneas is a facilities-based CLEC that focuses on serving specific rural areas in Tennessee and will continue to do so with the assistance of RDOF Phase I support from the FCC, both in areas where it already has ETC designation and the additional areas identified in Exhibit A. STEMCO will lease excess capacity on its backbone network to Aeneas, while Aeneas will be responsible for deploying and operating customer premise equipment connections to provide voice and high-speed broadband Internet access services throughout STEMCO's electric service territory, including the census blocks that Aeneas is seeking to add to its existing ETC service area. In addition, Aeneas plans to construct fiber optic plant beginning at the end of STEMCO's fiber backbone network into adjacent non-electric service territory to serve additional locations in need of voice and broadband services.

#### B. The Rural Digital Opportunity Fund

The FCC established the RDOF as a continuation of its efforts over nearly a decade to accelerate the deployment of high-speed fixed broadband service to all Americans. The program is being implemented in two phases, with the recently completed Phase I auction focused on areas that are wholly

unserved under the FCC's current 25/3 Mbps standard for fixed broadband. The FCC will authorize RDOF support to companies that commit to deploy and maintain voice and broadband service meeting the FCC's requirements to a specified number of locations (homes and small businesses) in the identified high-cost areas.

In order to participate in RDOF, interested parties must complete a two-step application process, with competitive bidding to determine who will receive funding and the amount of funding to be provided for a particular geographic area. The FCC determined which applicants were qualified to bid in the auction by evaluating information submitted in the so-called "short-form" application. The RDOF Phase I auction began on October 29, 2020 and concluded on November 25, 2020. As noted above, on December 7, 2020, the FCC issued a Public Notice, officially announcing the results of the competitive bidding process. In order to receive funding, winning bidders must complete a "long-form" application review process to demonstrate their financial and technical qualifications to deliver the intended service and meet other requirements.

Aeneas participated in the RDOF Phase I auction as a member of the Prospero Broadband Consortium ("Prospero"), a group of electric cooperatives and their subsidiaries which ultimately was a winning bidder for more than \$100 million in RDOF Phase I support. Pursuant to the process established in the *RDOF Auction Closing Public Notice*, Prospero has now assigned certain winning bids in Tennessee to Aeneas. Accordingly, Aeneas will be the entity that files a long-form application for RDOF funding to build and operate a network to serve the census blocks within its winning bids with voice and gigabit broadband service.

Upon completion of the FCC's application process and authorization of funding, Aeneas will receive a total of \$6,903,770 in RDOF Phase I support over a ten-year period in exchange for offering voice and broadband services to 10,393 homes and small businesses located in specific census blocks within the STEMC electric service territory and adjacent areas.

The vast majority of Aeneas' winning bids are located in areas where Aeneas has already been designated an ETC by this Commission.<sup>4</sup> However, two out of 56 of the Census block groups where Aeneas was a winning bidder are bisected by the boundary of Aeneas' existing ETC designation,<sup>5</sup> necessitating a small modification of the service area for its existing ETC designation in order to receive the funding associated with that area.<sup>6</sup> In particular, Aeneas already is an ETC for those funded census blocks that lie wholly within the AT&T study area, and it now seeks to enlarge its existing ETC service area to include those funded census blocks that lie partially or wholly within the study area of CenturyLink.

Exhibit A is a list of the census blocks within those two Census block groups in Tennessee that are wholly or partially within the CenturyLink study area, for which Aeneas must obtain a new high-cost ETC designation from the Commission in order to receive RDOF support.<sup>7</sup> Exhibit B shows where Aeneas is an existing ETC, which is shaded pale blue. Aeneas requests the boundary of its existing ETC designation be modified to include the funded census blocks within the two census block groups in eastern Chester County that are shaded in darker blue.<sup>8</sup>

As discussed in more detail below, the Commission has the authority to grant Aeneas's petition to modify its existing ETC designation pursuant to section 214(e)(2) of the Act, and Aeneas meets all of the relevant statutory and regulatory requirements.

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<sup>4</sup> As an existing ETC, Aeneas will be eligible to receive funding for the vast majority of its winning bids once the FCC completes its review of the long-form application.

<sup>5</sup> For administrative convenience, the FCC required bids in the RDOF Phase I auction to be placed on census block groups containing eligible census blocks, but the obligations and funding are associated with specific census blocks within each census block group.

<sup>6</sup> In particular, modification of the existing ETC service area is necessary to receive \$426,060 over a ten-year period to support the deployment of broadband to 1,513 homes and small businesses in the funded census blocks within two winning bids in Chester County, Tennessee.

<sup>7</sup> See Exhibit A (List of Census Blocks in which Aeneas Communications, LLC Seeks Eligible Telecommunications Carrier Designation).

<sup>8</sup> See Exhibit B (Map of Requested Service Area for Eligible Telecommunications Carrier Designation). As described more fully below, Aeneas also seeks Lifeline-only ETC designation in additional areas not receiving RDOF funding, as shown in light green on the map provided in Exhibit B.

II. THE COMMISSION HAS AUTHORITY TO GRANT THE REQUESTED MODIFICATION OF THE EXISTING ETC DESIGNATION

The Commission has authority to grant the request of Aeneas, a facilities-based CLEC registered and operating in the State of Tennessee.

Pursuant to section 214(e)(2) of the Act, a “State commission shall on its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission.”<sup>9</sup> Section 214(e)(1), in turn, states:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

Aeneas has been a common carrier operating in Tennessee for more than two decades, and as such, the Commission has jurisdiction to act on this request to modify the service area of its existing ETC designation.

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

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

A. Aeneas Is a Common Carrier

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<sup>9</sup> 47 U.S.C. § 214(e)(2).

As a registered competitive local exchange carrier, on the Commission's "List of Approved CLECS" under ID # 128370, Aeneas certifies that it is a common carrier operating in the State of Tennessee.<sup>10</sup>

Aeneas is aware that this Commission previously declined jurisdiction over a subsidiary of Gibson Electric Membership Corporation, which was a winning bidder in the Connect America Fund Phase II auction,<sup>11</sup> stating "the Tennessee Public Utility Commission does not exercise jurisdiction over broadband and Voice over Internet Protocol providers seeking Competitive Eligible Telecommunications Carrier designation (see Tenn. Code. Ann. § 7-59-307(d))."<sup>12</sup> However, that prior ruling may be distinguishable because Gibson's subsidiary, the entity seeking ETC designation, did not have decades of operational history as a CLEC operating in the state of Tennessee. Here, the petitioner seeking a modification of its existing ETC designation is a longstanding common carrier operating in the state of Tennessee, offering competitive local telecommunications and long distance telecommunications services, among other services. The fact that Aeneas is now owned by an electric cooperative, STEMC, does not mean it no longer is a common carrier.<sup>13</sup>

**B. Aeneas Will Offer the Services Supported by the Federal Universal Service Support Mechanisms Throughout the Requested Service Area**

For RDOF Phase I support recipients, the FCC defines the supported service as qualifying voice service and conditions grant of funding on the offering of qualifying broadband service.<sup>14</sup> In the 2011

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<sup>10</sup> See Exhibit C (Affidavit of Stephen Thorpe, Chief Executive Officer, Aeneas Communications, LLC ("Thorpe Affidavit")).

<sup>11</sup> See In the Matter of Gibson Connect, LLC Petition for Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act of 1934, WC Docket No. 09-197, Exhibit B (filed Sept. 27, 2018) (Gibson ETC petition filed at the FCC).

<sup>12</sup> Tenn. Code. Ann. § 7-59-307(d) provides that "[n]o franchising authority, state agency, municipality, county or political subdivision of the state is authorized to regulate the provision of retail interconnected voice over Internet protocol service."

<sup>13</sup> Because this is an issue of first impression, Aeneas has filed this petition with the Tennessee Commission so that it may consider whether these factual distinctions are relevant. In the event this Commission concludes that it does not have jurisdiction to act on this request to enlarge the scope of the service area of an existing ETC, Aeneas requests that the Commission expeditiously issue a ruling to that effect so that Aeneas may promptly refile its petition at the FCC.

<sup>14</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

*USF/ICC Transformation Order*, the FCC modified the definition of a supported service to reflect a technologically neutral approach, enabling companies to provision voice service over any platform, including both the PSTN and Internet Protocol (“IP”) networks.<sup>15</sup> Section 54.101 of the FCC’s rules was amended to specify that the functionalities of eligible voice telephony services include voice grade access to the PSTN *or its functional equivalent*.<sup>16</sup>

As described below, Aeneas certifies that it will provide the following services that are supported by the federal universal service support mechanisms.<sup>17</sup>

1. Voice Telephony – Aeneas owns its own soft switch, which is directly connected to the PSTN through an interconnection agreement with AT&T. As an existing voice provider of many years, Aeneas will continue to provide service consistent with the FCC’s universal service requirements.

The standard Aeneas voice service offers unlimited local calling, meeting the requirement to include minutes of use for local service provided at no charge to end users, and access to emergency services via 911 or E-911. Aeneas provides toll limitation services to qualifying low-income consumers. Aeneas also offers a voice service plan with unlimited usage within the United States.<sup>18</sup>

2. Broadband Internet Access Services – Aeneas’ 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 capabilities that are incidental to and enable the operation of the communications service.

Aeneas will offer service at rates that are reasonably comparable to rates in urban areas. To meet its RDOF public interest obligations, Aeneas plans to offer 1 Gbps/1 Gbps broadband service for \$99.95 per month. Aeneas will offer standalone voice telephony for \$24.95 per month. It also expects to offer the

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service as a high-cost public interest obligation); *see also Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, 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*), *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 high-cost support recipients to offer broadband as a condition of receiving support).

<sup>15</sup> *See id.* at para. 78.

<sup>16</sup> 47 C.F.R. § 54.101(a) (emphasis added).

<sup>17</sup> *See* Exhibit C (Thorpe Affidavit).

<sup>18</sup> 47 CFR § 54.401(a)(2).



following additional service tiers: 250Mbps/250Mbps broadband service for \$59.95 and 500Mbps/500Mbps broadband service for \$79.95] All service offerings have unlimited usage.

Aeneas commits to provide service consistent with the FCC’s high-cost universal service support rules applicable to it.<sup>19</sup> In addition, Aeneas will offer Lifeline discounts to qualifying low-income consumers consistent with the FCC’s Lifeline rules in the RDOF-funded census blocks and also in the additional areas where Aeneas is seeking a Lifeline-only ETC designation.<sup>20</sup>

### C. Aeneas Will Provide Service Using Its Own Facilities

Aeneas is and will continue to be a facilities-based CLEC that provides a variety of services, including competitive local telecommunications, long distance telecommunications, broadband Internet access, and voice telephony. Aeneas’s parent, STEMC, is in the process of constructing a fiber optic network for electric purposes and is leasing the excess capacity in those fiber facilities to Aeneas.<sup>21</sup> Aeneas will deploy additional facilities, including in some areas, backbone fiber and drops to the home to initiate service for end user customers.

### D. Aeneas Will Provide Supported Service Throughout Its Designated Service Area

Aeneas commits to providing the supported services throughout its service area, consistent with all applicable requirements. The requested modification of its existing ETC service area in Chester County, Tennessee is necessary in order to obtain high-cost support – specifically, the Rural Digital Opportunity Fund – associated with the census blocks identified in Exhibit A. In addition, Aeneas seeks a Lifeline-only designation for additional areas not part of its existing ETC service, so that it may offer

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<sup>19</sup> See 47 CFR §§ 54.101(c), 54.805-54.806.

<sup>20</sup> See *id.* § 54.101(d); *Lifeline Reform Order*, 31 FCC Rcd at 3974, 4074-75, paras. 35, 311-12 (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>21</sup> See *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197 and 10-90, Public Notice, 33 FCC Rcd 6696, 6698 (WCB 2019) (*ETC Process Public Notice*) (“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.”).

Lifeline services to additional areas where its parent STEMC provides electricity, as shown in the areas shaded in light green on the map provided in Exhibit B.<sup>22</sup>

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

Aeneas will advertise the availability of, and charges for, its supported service offerings using media of general distribution in a manner that is designed to reach those likely to qualify for such service and plans to undertake outreach initiatives to increase consumer awareness of its service offerings, consistent with all applicable requirements.

Aeneas will advertise its supported services to all eligible customers in the new service area using a mix of printed materials such as flyers, newsletters, and direct mail, supplemented with digital advertising and social media,<sup>23</sup> with a goal of ensuring every potential customer knows the Aeneas brand is available. Aeneas also is considering marketing its service through radio, television, local newspapers, and outdoor advertising.

F. Aeneas Will Comply with the FCC's Additional Requirements for Designation as an ETC

Aeneas certifies that it possesses the financial and technical capabilities to complete construction of its planned broadband network and to meet its ETC obligations by offering voice and broadband services throughout the proposed service area. Aeneas expects to be able to obtain the requisite amount of lending under existing lines of credit, and additional financing as necessary, with the financial backing of its parent. As part of the FCC's long-form application process, Aeneas will be providing an overview of how it will finance its planned network in the RDOF-funded areas and a certification from a professional

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<sup>22</sup> The incumbent telecommunications carrier in the requested Lifeline-only areas in McNairy and Henderson Counties, adjacent to the RDOF winning bids in Chester County, is CenturyLink. The incumbent telecommunications carrier in the requested Lifeline-only service area in Tipton, Shelby, Haywood, and Fayette Counties is Ritter Communications.

<sup>23</sup> Communications channels have evolved considerably in recent years to include channels beyond traditional print and broadband media. The FCC has recognized this transition for advertising to Lifeline eligible customers as well. *See Lifeline Reform Order*, paras. 362-365; *Lifeline and Link-Up*, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 8302, para. 46 (2004) (including in its guidelines that carriers may post outreach material on the Internet).

engineer that the fiber optic network is capable of delivering voice and broadband service that meets the requisite RDOF performance requirements with sufficient capacity to meet customer demand at or above the prescribed levels during peak usage.

Aeneas certifies that it will satisfy all consumer protection and service quality standards required by the FCC,<sup>24</sup> as well as all applicable state-specific consumer protection and service quality standards.

Aeneas further certifies that its fiber optic network will have the ability to remain functional in emergency situations, reroute traffic around damaged facilities, and be capable of managing traffic spikes resulting from emergency situations, and it will offer subscribers options for battery back-up power to ensure functionality without an external power source. Aeneas's fiber optic network will support telephone service using Session Initiation Protocol-based VoIP technology and will support all phone features, including 911 services.

Aeneas plans to offer the same Lifeline service to all customers, both in RDOF-funded areas and those areas where it seeks a Lifeline-only ETC designation. The Lifeline offering will enable low-income households to apply the FCC's Lifeline discount to all service tiers that are generally available to all Aeneas customers. All Aeneas broadband services include unlimited usage. Aeneas plans to offer three tiers for broadband services. The basic broadband tier will be a 250Mbps symmetrical connection for \$59.95 per month. The second "Standard" tier will be a 500Mbps symmetrical connection for \$79.95 per month. The third premium tier will be a 1 Gigabit symmetrical connection for \$99.95 per month. As such, Aeneas's Lifeline offerings will significantly exceed the FCC's current 25/3 Mbps minimum service standards for fixed broadband Lifeline service. Aeneas also plans to offer phone service with unlimited

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<sup>24</sup> See 47 CFR. § 54.202(a)(3). For applicants seeking ETC designation for the purposes of becoming authorized to receive Connect America Fund Phase II auction support, the FCC waived the requirement to submit proof of compliance with consumer protection and service quality standards—finding that the need for such requirements is obviated by specific service quality standards applicable to the winning bid areas and specific reporting obligations relating to such standards. See *ETC Process Public Notice*, 33 FCC Red at 6699-6700.

nationwide calling for \$24.95. The Lifeline subsidy will be used to reduce the amount charged for each service offering.

IV. GRANT OF THE REQUEST TO MODIFY THE ETC SERVICE AREA OF AENEAS WILL BE IN THE PUBLIC INTEREST

Modifying the existing ETC service area of Aeneas to include the additional requested areas in Tennessee will serve the public interest by facilitating the FCC's goal of deploying voice and high-speed broadband networks in rural, high-cost areas lacking 25/3 Mbps broadband service. As a recipient of federal high-cost funding, the Company will be deploying advanced communications to 1,513 homes and small businesses in this new service area in Tennessee, benefitting more than 3,000 residents. Moreover, Aeneas will be the *only* provider that is authorized to receive federal RDOF support for the development and deployment of this essential communications infrastructure. Consequently, enlarging the existing ETC service area of the Company will ensure that the residents of this discrete area in Tennessee receive the benefits of this federal funding.

Expedited action on this petition will serve the public interest by ensuring that the Company is eligible to receive federal high-cost USF support and able to deploy critical communications facilities as soon as possible. Events of the last year have made it clear, more than ever, how essential broadband is to maintain critical connections with family, education, healthcare, jobs, and more. Aeneas will use this funding to directly advance the FCC's goal of deploying voice and high-speed broadband-capable networks in rural, high-cost areas, while ensuring that rural communities benefit from innovations in communications technology.

In addition, designating Aeneas as a Lifeline-only ETC in the requested Lifeline-only service area set forth in Exhibit B will serve the public interest by making available robust fixed broadband Lifeline offerings with unlimited usage for additional low-income households outside of the RDOF-funded areas. Aeneas's Lifeline offerings will greatly benefit low-income consumers within the requested service area in Tennessee.

V. CONCLUSION

For all of the foregoing reasons, Aeneas respectfully requests that the Commission enlarge the geographic scope of its existing high-cost ETC service area to include the census blocks listed in Exhibit A so that it may be authorized to receive RDOF Phase I support for those areas on a timely basis, and designate it as a Lifeline-only ETC in additional areas, as shown in Exhibit B.

Respectfully submitted,

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January 5, 2021

## **EXHIBITS**

### **EXHIBIT A:**

**LIST OF CENSUS BLOCKS IN WHICH AENEAS COMMUNICATIONS, LLC  
SEEKS ELIGIBLE COMMUNICATIONS CARRIER DESIGNATION**

### **EXHIBIT B:**

**MAP OF REQUESTED SERVICE AREA FOR ELIGIBLE  
TELECOMMUNICATIONS CARRIER DESIGNATION**

### **EXHIBIT C:**

**AFFIDAVIT OF STEPHEN THORPE, CHIEF EXECUTIVE OFFICER, AENEAS  
COMMUNICATIONS, LLC**

**EXHIBIT A**

**LIST OF CENSUS BLOCKS IN WHICH AENEAS COMMUNICATIONS, LLC  
SEEKS ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

Census Block ID	County	Census Block Group ID
470239701001000	Chester	470239701001
470239701001001	Chester	470239701001
470239701001002	Chester	470239701001
470239701001003	Chester	470239701001
470239701001012	Chester	470239701001
470239701001016	Chester	470239701001
470239701001018	Chester	470239701001
470239701001019	Chester	470239701001
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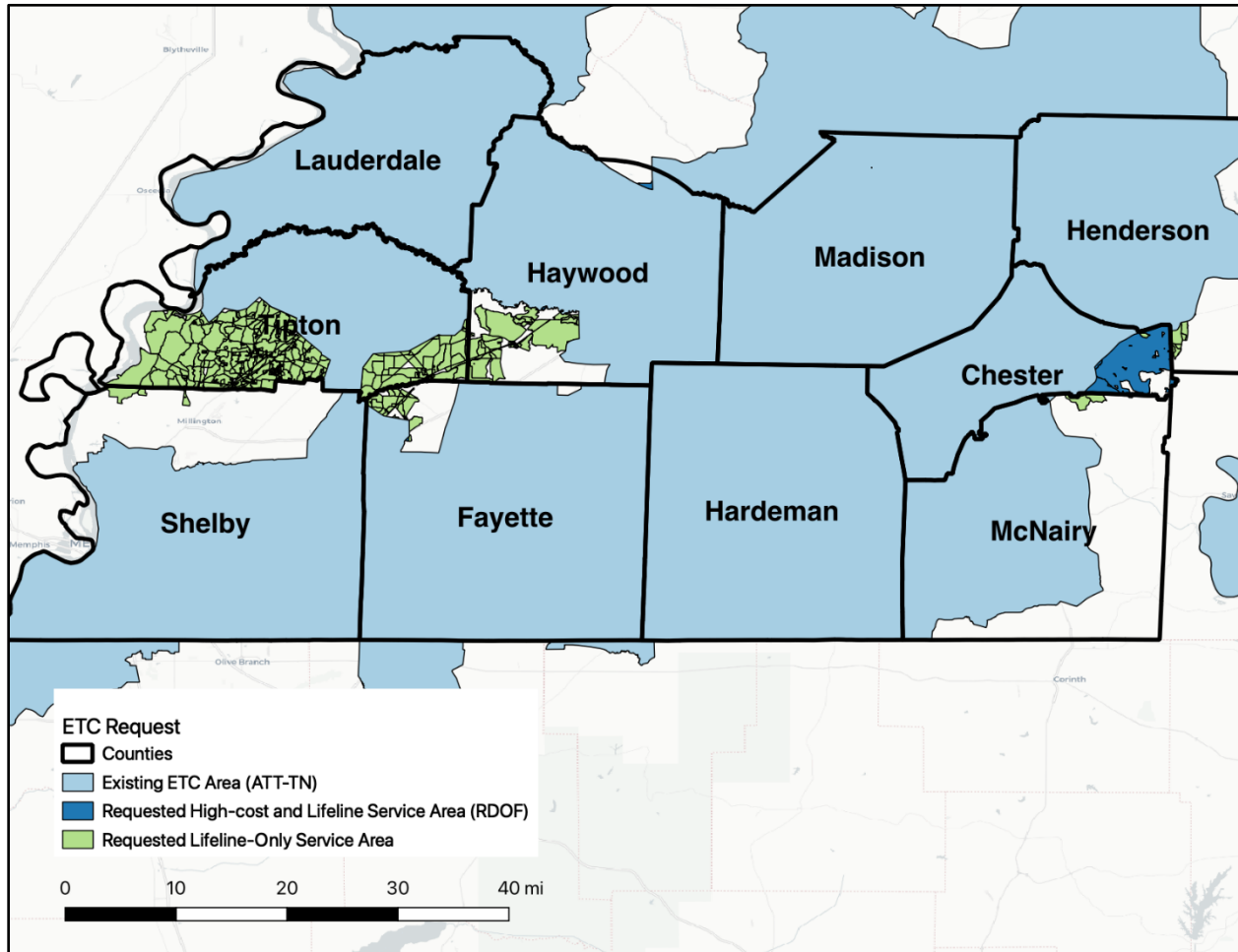
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470239701002132	Chester	470239701001
470239701002133	Chester	470239701002
470239701002134	Chester	470239701002
470239701002141	Chester	470239701002

## EXHIBIT B

### MAP OF REQUESTED SERVICE AREA FOR ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION



**EXHIBIT C**

**AFFIDAVIT OF STEPHEN THORPE, CHIEF EXECUTVE OFFICER, AENEAS  
COMMUNICATIONS, LLC**

Tennessee

) SS.

COUNTY OF Haywood

Stephen Thorpe, 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 Aeneas Communications, LLC ("Aeneas"). Acting on behalf of Aeneas, 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. Aeneas certifies that it is a common carrier under sections 214(e)(1) and 214(e)(2) of the Communications Act of 1934 ("Act").
4. Aeneas commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier in the service area described in the Petition.
5. Aeneas certifies that it will meet all of the requirements for designation as an ETC set forth in section 214(e)(1) of the Act.
6. I am the corporate officer that will be responsible for certifying Aeneas's use of federal high-cost support.

7. Aeneas 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.

This the 5 day of January, 2021.



Stephen Thorpe

Chief Executive Officer

Aeneas Communications, LLC

Sworn and subscribed to me, a notary public, on this the 4<sup>th</sup> day of January, 2021.

My commission expires 05/22/2023



Notary Public