

**BEFORE THE
 STATE CORPORATION COMMISSION
 OF THE STATE OF KANSAS**

In the Matter of the Application of)	
)	
CABLE ONE VOIP LLC)	Docket No. <u>21-COIC-478-ETC</u>
)	
for Designation as an Eligible Telecommunications)	
Carrier in the State of Kansas to Receive)	
Federal and State Lifeline Support)	
_____)	

**APPLICATION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS
 CARRIER TO RECEIVE FEDERAL AND STATE LIFELINE SUPPORT**

Cable One VoIP LLC (the “Company”) respectfully submits this Application for Designation as an Eligible Telecommunications Carrier (“Application”) pursuant to Section 214(e)(2)¹ of the federal Communications Act of 1934, as amended (the “federal Act”), the rules and regulations of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Kansas Corporation Commission (the “Commission”).³ The Company seeks eligible telecommunications carrier (“ETC”) designation for the provision of broadband Internet access and voice services in the Designated Service Area set forth in **Exhibit 1**.

The Company’s parent, Cable One, Inc. (“Cable One”), is a participant in the FCC’s Emergency Broadband Benefit (“EBB”) Program pursuant to which eligible low-income households in Kansas may receive a discount off the cost of broadband Internet access service (or voice/Internet access bundles).⁴ The EBB Program is a temporary, emergency program that will

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.201, 54.202; *Lifeline and Link Up Reform and Modernization; et al.*, 27 FCC Rcd 6656 (2012) (“*Lifeline Reform Order*”).

³ *See, e.g.*, Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designations of Eligible Telecommunications Carrier (Oct. 2, 2006); Docket No. 10-GIMT-658-GIT, Order Addressing Issues Concerning the Kansas Lifeline Service Program (Aug. 17, 2011).

⁴ WC Docket No. 20-445, *Emergency Broadband Benefit Program*, Report and Order, FCC 21-29 (rel. Feb.

come to an end once the funds appropriated by Congress have been expended or six months after the Department of Health and Human Services declares the end of the COVID-19 health emergency, whichever comes first. Recognizing the finite nature of the EBB Program, the FCC has encouraged providers to assist consumers with the transition to comparable broadband services or continue to offer the same broadband service at a discounted rate after conclusion of the EBB Program.⁵ To that end, the Company seeks ETC designation in the Designated Service Area to ensure low-income Kansas consumers can continue to receive discounted broadband Internet access service (or voice/Internet bundles) after the conclusion of the EBB Program. Accordingly, the Company respectfully requests expedited review of this Application to ensure low-income Kansas consumers can continue to access “the broadband they need to participate in virtual learning, complete their homework, and communicate with employers and healthcare providers” once the EBB Program ends.⁶

As demonstrated herein, the Company meets all of the statutory and regulatory requirements for designation as a federal and state Lifeline-only ETC in the state of Kansas. In support of this Application, the Company states:

BACKGROUND

1. The Company is a Delaware limited liability company with a principal place of business located at 210 E. Earll Drive, Phoenix, Arizona 85012. The Company is registered with the Kansas Secretary of State to conduct business in the state as shown in **Exhibit 2**. The Company will operate under the DBA brand “Sparklight” in Kansas. Attached as **Exhibit 3** is a current list

26, 2021) (“*EBB Order*”). Additional information regarding the FCC’s EBB Program can be found at: <https://www.fcc.gov/emergency-broadband-benefit-program>.

⁵ *EBB Order* ¶¶ 130-31.

⁶ *EBB Order* ¶ 130.

of the Company's officers, along with relevant biographical information.

2. The Company currently offers interconnected Voice over Internet Protocol ("VoIP") service in the state of Arizona. The Company also is registered with the Louisiana Public Service Commission, Washington Utilities and Transportation Commission, and Iowa Utilities Board to provide interconnected VoIP service, and holds certification in the state of Nebraska.

3. The Company was a winning bidder in the recent FCC Rural Digital Opportunity Fund ("RDOF") auction (Auction 904).⁷ In connection with RDOF, the Company has received ETC designation in Arizona, Arkansas, Idaho, Iowa, Louisiana, Minnesota, Nebraska, New Mexico, North Dakota, Texas, and Washington (and in most instances, those designations also include Lifeline-only ETC designation in non-RDOF areas). The Company also has Lifeline-only ETC applications pending in Washington and at the FCC for the states of Alabama and Tennessee, and plans to file additional Lifeline-only ETC applications in other states to continue serving low-income customers after the conclusion of the EBB Program. The Company has never been denied ETC designation by any state commission or by the FCC.

4. The Company is a wholly owned subsidiary of Cable One, a publicly traded Delaware corporation (NYSE: CABO), and Cable One serves as the sole member of the Company. Cable One and its subsidiaries provide cable/video, Internet access, broadband, and voice services in 24 states, including Kansas. Cable One holds a Video Service Authorization in Kansas,⁸ and the Company's affiliate, Valu-Net LLC ("Valu-Net") is a competitive local exchange carrier that

⁷ *Rural Digital Opportunity Fund, et al.*, 35 FCC Rcd 686 (2020) ("*RDOF Order*"). The Company's parent, Cable One, was a member of the Wisper-CABO 904 Consortium.

⁸ Docket No. 10-COIC-696-VSA.

also holds Video Service Authorization in Kansas.⁹ Other subsidiaries of Cable One hold ETC designation in the states of Georgia, Illinois, Missouri, Oklahoma, and South Carolina.

5. Pleadings, orders, notices, and other correspondence filed in this matter should be served upon:

Patrick N. Caron
Assistant General Counsel
Cable One, Inc.
210 E. Earll Drive
Phoenix, Arizona 85012
602-364-6000 (telephone)
Patrick.Caron@cableone.biz

and

Chérie R. Kiser
Angela F. Collins
Cahill Gordon & Reindel LLP
1990 K Street, N.W., Suite 950
Washington, D.C. 20006
202-862-8900 (telephone)
212-269-5420 (facsimile)
ckiser@cahill.com
acollins@cahill.com

The above-referenced individuals agree to receive all Commission notices and orders regarding this proceeding via electronic mail.

**INFORMATION REQUIRED UNDER FCC AND
STATE RULES FOR ETC DESIGNATION**

6. Section 214(e)(1) of the federal Act, the FCC's rules, and Commission orders set forth certain requirements for ETC designation.¹⁰ The Company meets each of these requirements.

7. Designated Service Area. The Company's proposed Designated Service Area is

⁹ Docket Nos. 11-VNLT-857-COC and 13-VNLT-556-VSA.

¹⁰ 47 U.S.C. § 214(e)(1); 47 C.F.R. §§ 54.201, 54.202; Docket No. 06-GIMT-446-GIT, Order Adopting Requirements for Designations of Eligible Telecommunications Carrier (Oct. 2, 2006); Docket No. 10-GIMT-658-GIT, Order Addressing Issues Concerning the Kanas Lifeline Service Program (Aug. 17, 2011).

set forth in **Exhibit 1**, which includes maps of the proposed Designated Service Area. The Designated Service Area consists of the cable franchise areas served by Cable One (the Company's parent) in Kansas pursuant to Cable One's statewide Video Service Authorization and the cable franchise area served by Valu-Net (the Company's affiliate) in Kansas pursuant to Valu-Net's statewide Video Service Authorization. The Company confirms that none of the Company's proposed Designated Service Area is served by a rural telephone company.

8. FCC Rule 54.201(c); FCC Rule 54.202(b). An ETC applicant must demonstrate the ETC designation is consistent with the public interest, convenience, and necessity, and in the case of an area served by a rural telephone company, demonstrate the public interest will be met by an additional designation.

9. Designation of the Company as an ETC will serve the public interest, convenience, and necessity. ETC designation will permit the Company to provide Lifeline services to low-income consumers in Kansas, and ensure those consumers can continue to have access to discounted broadband services after conclusion of the EBB Program. The planned deployment in the Designated Service Area will further the goals of the Commission and the FCC by expanding the reach of digital connectivity to promote economic growth in rural areas and ensure quality communications services are available at "just, reasonable, and affordable rates."¹¹ As the FCC has observed, "an important goal of the [federal] Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies."¹²

¹¹ 47 U.S.C. § 254(b)(1).

¹² *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

10. Further, designation of the Company as a Lifeline-only ETC will have no material impact on the federal or Kansas Lifeline funds. Lifeline support follows the customer, so a customer taking Lifeline service from either the Company or another provider will cause the identical amount of impact upon those universal service funds. In addition, the Company is uniquely situated to provide the supported services in the Designated Service Area because it is an established provider with a stable and robust network, and is a member of a large family of companies that have been offering service in Kansas and other states for many years.

11. FCC Rule 54.201(d). An ETC applicant must be a “common carrier” as defined by federal law.¹³ The Company will provide broadband Internet access service and voice service in the Designated Service Area. The Company will provide voice service as interconnected VoIP service in Kansas. The Company will provide its voice service on a common carrier basis to Lifeline customers in the Designated Service Area.

12. FCC Rule 54.201(d)(1); FCC Rule 54.201(i). An ETC applicant must demonstrate that it is capable of providing and will continuously provide the supported services throughout the service area either by using its own facilities or a combination of its own facilities and the resale of another carrier’s services. The Company certifies it will offer the services that are supported by the federal universal service support mechanisms in the Designated Service Area using a combination of its own facilities and the facilities of other providers.

13. Two services are supported by the federal universal service support mechanisms: (1) voice telephony services; and (2) broadband Internet access services. Eligible voice telephony services must provide voice grade access to the public switched telephone network (“PSTN”) or its functional equivalent, minutes of use for local service provided at no additional charge, access

¹³ 47 U.S.C. § 153(11).

to emergency 911 and enhanced 911 service in locations where implemented, and for qualifying low-income consumers, toll limitation service.¹⁴ Eligible broadband Internet access services must 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, but excluding dial-up service.¹⁵

14. The Company certifies that it will offer voice and broadband services in the Designated Service Area that satisfy the FCC's requirements. The Company's voice offering will provide voice grade access to the PSTN, and will include unlimited local calling. In addition, the Company's voice offering will provide consumers with access to 911 and enhanced 911 to the extent local governments have implemented such services. The FCC eliminated the requirement to provide toll limitation services if a Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.¹⁶ As explained below, the Company is not required to provide toll limitation service in connection with its Lifeline service offering because the Company plans to offer unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area. If a Lifeline customer chooses a calling plan that does not include unlimited voice calling within the United States, the Company will provide toll limitation service to that customer at no cost.

15. Similarly, the Company's broadband Internet access service will provide consumers with the capability to transmit data to and receive data from all or substantially all Internet endpoints. The Company's broadband Internet access service will meet the minimum

¹⁴ 47 C.F.R. § 54.101(a)(1).

¹⁵ 47 C.F.R. § 54.400(l).

¹⁶ *Lifeline Reform Order* ¶ 49.

service standards required by the FCC's rules for Lifeline service offerings.¹⁷

16. The Company will use a combination of its own facilities and the facilities of other providers to offer Lifeline service in the Designated Service Area. The Company's parent Cable One is a facilities-based cable operator in Kansas and has facilities in the franchise areas set forth in **Exhibit 1** to this Application. The Company will provide Lifeline service using the existing facilities-based network of its parent Cable One. The Company also has entered into a contract with a third-party telecommunications carrier to support its provision of interconnected VoIP service in Kansas (and other states). Pursuant to that contract, the third-party telecommunications carrier provides all services and functions related to the PSTN. These PSTN-related services and functions include providing access to 911/E911, as well as obtaining telephone numbers for use by the Company's customers, converting interconnected VoIP service calls into the appropriate format for PSTN transmission, establishing relationships with other telecommunications companies, maintaining necessary communications transmission facilities, and transmitting interconnected VoIP calls to and from the PSTN as needed. Under FCC rules, 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.¹⁸

17. FCC Rule 54.201(d)(2); FCC Rule 54.405(b)-(d). An ETC applicant must demonstrate that it will advertise the availability of its offering and service charges using media of general distribution. The Company will publicize the availability of its voice and broadband service offerings throughout the Designated Service Area using media of general distribution.¹⁹

¹⁷ 47 C.F.R. § 54.408.

¹⁸ *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, 33 FCC Rcd 6696, nn. 23-24 (2018).

¹⁹ 47 C.F.R. § 54.201(d)(2).

The Company will use a combination of digital and traditional media, such as the Internet, outbound email, outdoor advertising, radio advertising, newspaper and magazine advertising, and direct marketing materials. The Company also will rely on the marketing practices and advertising expertise of Cable One to advertise the availability of its service offerings in the Designated Service Area.

18. In addition, with respect to Lifeline services, the Company will publicize the availability of the Lifeline discount in the Designated Service Area in a manner reasonably designed to reach those likely to qualify for the service.²⁰ Using easily understood language, the Company will indicate on all materials describing Lifeline that: (1) it is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers may enroll in the program; and (5) the program is limited to one discount per household.²¹ The Company also will disclose its name or its DBA name on all materials describing the Lifeline service.²²

19. Further, the Company will use “meaningful language” in its advertising so that consumers will understand what they can expect from an ETC. The Company will provide contact information for the Commission’s Office of Public Affairs and Consumer Protection in its advertisements to ensure customers know who to contact with questions and complaints. The Company provides the following sample language:

Sparklight will provide Lifeline service throughout its service territory. To learn about the Lifeline program and discounts you may be eligible to receive, visit our webpage at www.sparklight.com. Customers may contact the Kansas

²⁰ 47 C.F.R. § 54.405(b).

²¹ 47 C.F.R. § 54.405(c). For these purposes, the term “materials describing the service” includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms. *See id.*

²² 47 C.F.R. § 54.405(d).

Corporation Commission's Office of Public Affairs and Consumer Protection with any concerns at 800-662-0027 or 785-271-3140.

20. FCC Rule 54.201(h); FCC Rule 54.202(a)(4). An ETC applicant must demonstrate it is financially and technically capable of providing Lifeline service in compliance with the FCC's rules. The FCC has stated that the "relevant considerations" for satisfying this requirement are whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.²³

21. The Company is financially and technically capable of offering Lifeline services in the Designated Service Area. The Company's parent and affiliates have been offering services in Kansas and several other states for many years. Cable One also can provide the Company with additional financial and technical support as needed, and the Company will utilize the same personnel for management and day-to-day operations.²⁴ The Company currently provides non-Lifeline voice services in Arizona; it will not rely exclusively on universal service fund disbursements to operate. Finally, the Company has not been subject to enforcement action or ETC revocation proceedings in any state.

22. FCC Rule 54.202(a)(1). An ETC applicant must certify that it will comply with the service requirements applicable to the support it receives, and submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network

²³ *Lifeline Reform Order* ¶ 388.

²⁴ The Company's financial reporting is consolidated with its parent Cable One. Financial information concerning Cable One can be found at: <https://ir.cableone.net/corporate-profile/default.aspx>.

throughout its proposed service area. The Company certifies that it will comply with the service requirements applicable to Lifeline support in the Designated Service Area. There are no planned investments to be made for the Company to offer Lifeline service in the Designated Service Area. The Company will be able to provide voice and broadband Internet access service to all requesting customers in the Designated Service Area upon initial ETC designation by the Commission. Further, a five-year network improvement plan is no longer necessary for entities seeking Lifeline-only designation.²⁵

23. FCC Rule 54.202(a)(2). An ETC applicant must demonstrate that it can remain functional in emergency situations. The Company certifies it will have the ability to remain functional in emergency situations in the Designated Service Area. The Company has sufficient back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. In addition, as a subsidiary of Cable One, the Company will be able to rely on Cable One's disaster recovery contingency plans such as the use of diverse/alternate routing, electronics redundancy, redundant data centers, geographically separated operations, and environmental controls for data and switching centers to remain functional in an emergency situation. Cable One maintains geo-diverse data centers, which house back office and customer support systems. Cable One's network interconnects with transit and peering organizations at six geo-redundant locations across the United States, which makes the network highly redundant and provides full failover capacity should any site become unavailable.

24. Further, as a provider of interconnected VoIP service, the Company also is subject

²⁵ *Lifeline Reform Order* ¶ 386.

to FCC requirements regarding back-up power.²⁶ Under FCC Rule 9.20, any provider of a facilities-based, fixed voice service offered as residential service that is not line-powered must offer subscribers the option to purchase backup power for the voice service, and must make certain annual disclosures regarding the availability of such backup power options.

25. FCC Rule 54.202(a)(3). An ETC applicant must certify that it will comply with all applicable service quality standards and consumer protection rules. The Company certifies that it will comply with service quality standards and consumer protection rules applicable to its provision of service in the Designated Service Area. Cable One and its subsidiaries, including the Company, have a long history of offering service in Kansas and many other states.²⁷ The Company commits to abide by all applicable Kansas and federal consumer protection and service quality standards to the extent applicable to the services provided by the Company in the Designated Service Area.

26. FCC Rule 54.202(a)(5); FCC Rule 54.202(a)(6). FCC rules require ETC applicants to provide information describing the terms and conditions of voice telephony service and broadband Internet access service plans to be offered to Lifeline subscribers. For Lifeline services, the FCC has determined that providers may satisfy the obligation to provide local usage via service offerings that bundle local and long distance minutes.²⁸ If an ETC offers plans to Lifeline subscribers that are generally available to the public, the ETC may provide summary information

²⁶ 47 C.F.R. § 9.20.

²⁷ See, e.g., Cable ONE Captures Top Spot in the West in J.D. Power Residential Internet Satisfaction Study (Oct. 31, 2018), <https://www.businesswire.com/news/home/20181031005045/en/Cable-ONE-Captures-Top-Spot-in-the-West-in-J.D.-Power-Residential-Internet-Satisfaction-Study>

²⁸ *Lifeline Reform Order* ¶ 49.

regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.²⁹

27. At this time, the Company plans to offer service plans that include broadband Internet access service and unlimited voice calling within the United States for a fixed monthly price in the Designated Service Area. The Company also will offer standalone voice services, but notes the federal Lifeline discount is scheduled to sunset as of December 1, 2021 for voice-only service³⁰ (voice-only service would continue to be eligible for discount under the Kansas Lifeline program). The Company's service plan information is available on its website: www.sparklight.com. These are the same plans the Company's parent Cable One is offering in Kansas under the EBB Program. The Company will apply the Lifeline discount to any voice, broadband, or bundled plans that meet the FCC's minimum service requirements for Lifeline services.

28. The Company's pricing will be reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements.³¹ By way of example, the FCC's 2021 urban average monthly rate is \$33.73, and the reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$54.75.³² Accordingly, each ETC providing fixed voice service must certify to the FCC in July 2021 that the pricing of its basic

²⁹ 47 C.F.R. § 54.401(d).

³⁰ <https://www.usac.org/lifeline/get-started/eligible-services/lifeline-supported-voice-service/>.

³¹ 47 C.F.R. § 54.313(a)(2), (3).

³² *Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2021 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers*, 35 FCC Rcd 13667 (2020) ("Comparability PN").

residential voice services is no more than \$54.75. The FCC has adopted similar benchmarks for broadband Internet access service, which vary based on the speed and usage allowance.³³

29. FCC Rule 54.405(a). An ETC must make Lifeline service available to qualifying low-income consumers. The Company certifies that its Lifeline service offering will conform to the definition of “Lifeline” in the FCC’s rules.³⁴

30. FCC Rule 54.405(e). An ETC must implement certain de-enrollment procedures for Lifeline customers. The Company certifies it will comply with the FCC’s de-enrollment procedures for Lifeline services and has general de-enrollment procedures in place for Lifeline services. In accordance with FCC requirements, the Company will de-enroll Lifeline customers for: no longer qualifying for Lifeline service; duplicative support; non-usage; failure to re-certify; and when requested by the Lifeline customer.

31. FCC Rule 54.409; FCC Rule 54.410. The Company certifies that it will verify the eligibility of its Lifeline subscriber base in accordance with FCC rules using the Lifeline National Verifier and/or the National Lifeline Accountability Database (“NLAD”). The Company has established processes for ensuring Lifeline services are provided only to eligible customers, including procedures for confirming consumer eligibility, enrolling eligible customers, re-certifying eligibility at regular intervals, and recordkeeping. These processes will be consistent with the Lifeline processes currently used by the Company and its ETC affiliates, and consistent with the processes being used by Cable One (and the Company’s other affiliates) for the EBB Program, which has certification and verification requirements similar to those used in the Lifeline program.

³³ *Comparability PN* at 3.

³⁴ 47 C.F.R. § 54.401(a).

CONCLUSION

For the foregoing reasons, the Company respectfully requests that the Commission designate it as a federal and state Lifeline ETC for the provision of voice and broadband Internet access services in the Designated Service Area on expedited basis to ensure low-income Kansas customers can continue to receive the benefits of discounted broadband Internet access and/or voice offerings after conclusion of the EBB Program.

Dated: June 29, 2021

Respectfully submitted,

CABLE ONE VOIP LLC

/s/ Patrick N. Caron

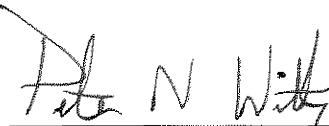
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602-364-6000 (telephone)
Patrick.Caron@cableone.biz

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202-862-8900 (telephone)
212-269-5420 (facsimile)
ckiser@cahill.com
acollins@cahill.com

VERIFICATION

I, Peter N. Witty, hereby state under penalty of perjury under the laws of the State of Kansas that I am the Vice President and Secretary of Cable One VoIP LLC (the "Company"); that I am authorized to make this Verification on behalf of the Company; that the foregoing Application was prepared under my direction and supervision; and that the contents of the foregoing Application are true and correct to the best of my knowledge, information, and belief.

Executed this 11th day of June 2021 in Phoenix, Arizona.

A handwritten signature in black ink, appearing to read "Peter N. Witty", is written over a horizontal line.

Peter N. Witty
Vice President & Secretary
Cable One VoIP LLC

EXHIBITS

- | | |
|------------------|--|
| Exhibit 1 | Designated Service Area |
| Exhibit 2 | Kansas Secretary of State Documentation |
| Exhibit 3 | Officers |

EXHIBIT 1

Designated Service Area

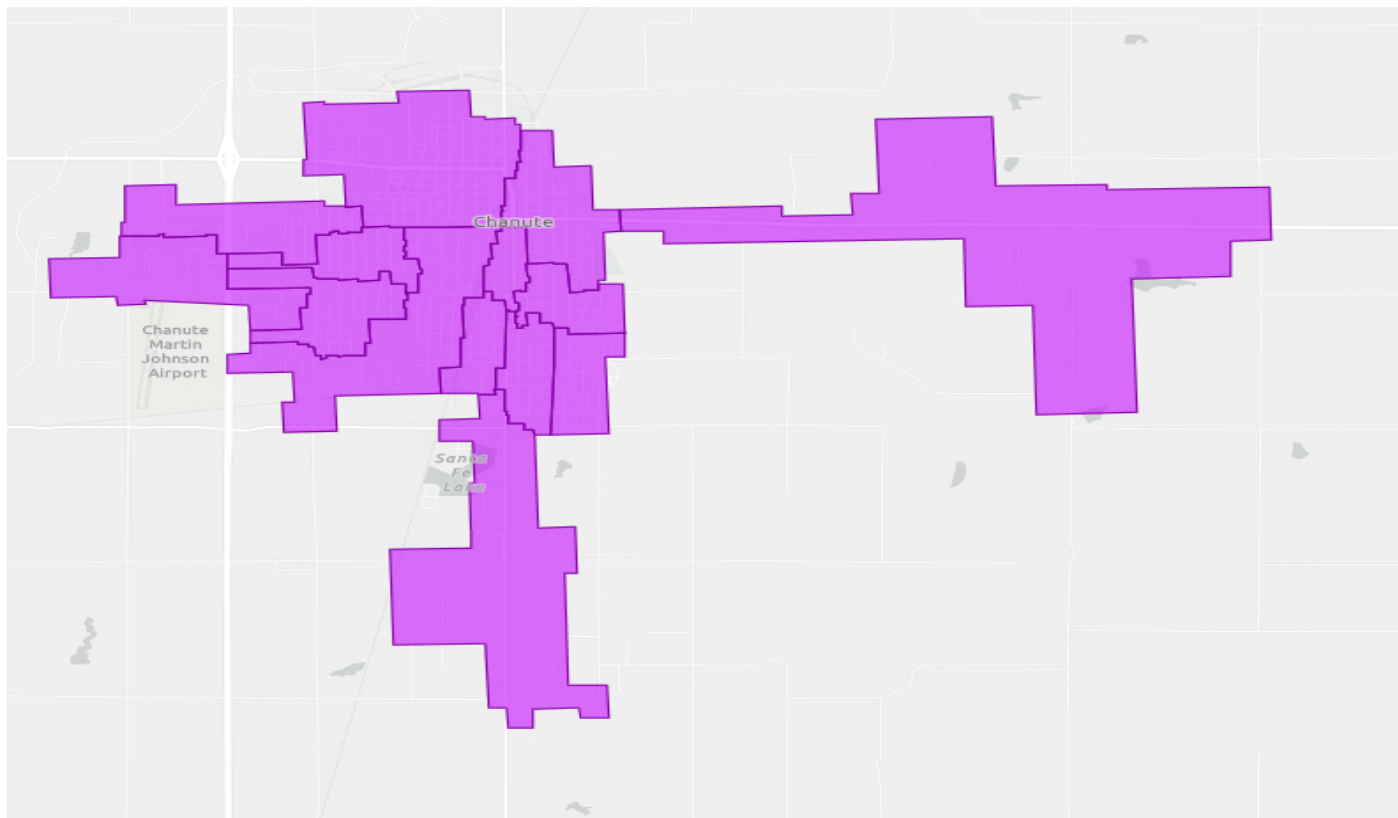
The Designated Service Area consists of the current cable franchise areas served by Cable One, Inc. (the Company's parent) in Kansas pursuant to its statewide Video Service Authorization and the areas served by Valu-Net LLC (the Company's affiliate) in Kansas pursuant to its statewide Video Service Authorization:

Cable Franchise Areas

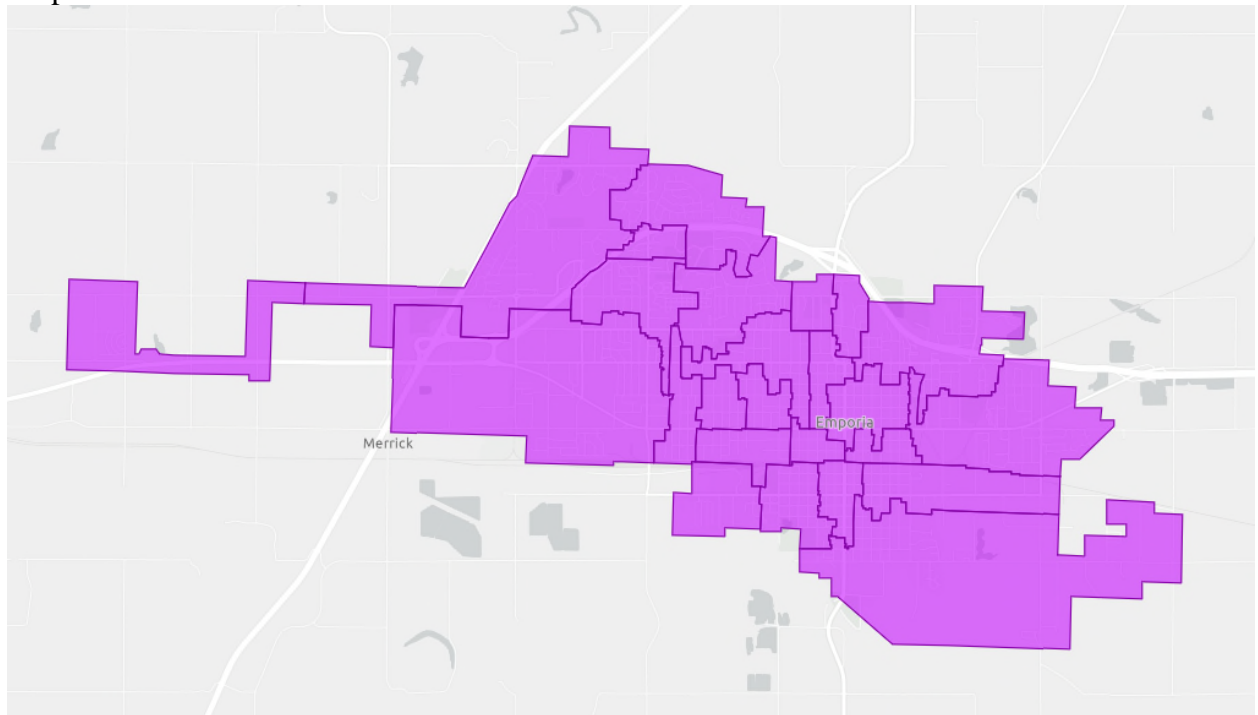
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Emporia (EMPO-06-COIC-01 and EMPR-01-VNLT-01)
Independence (INDP-05-COIC-01)
Neodesha (NEOD-02-COIC-01)
Baxter Springs (BXSP-07-COIC-02)
Parsons (PARS-03-COIC-01)
Sycamore (Montgomery County) (SYCA-01-COIC-01)

Maps of Designated Service Area

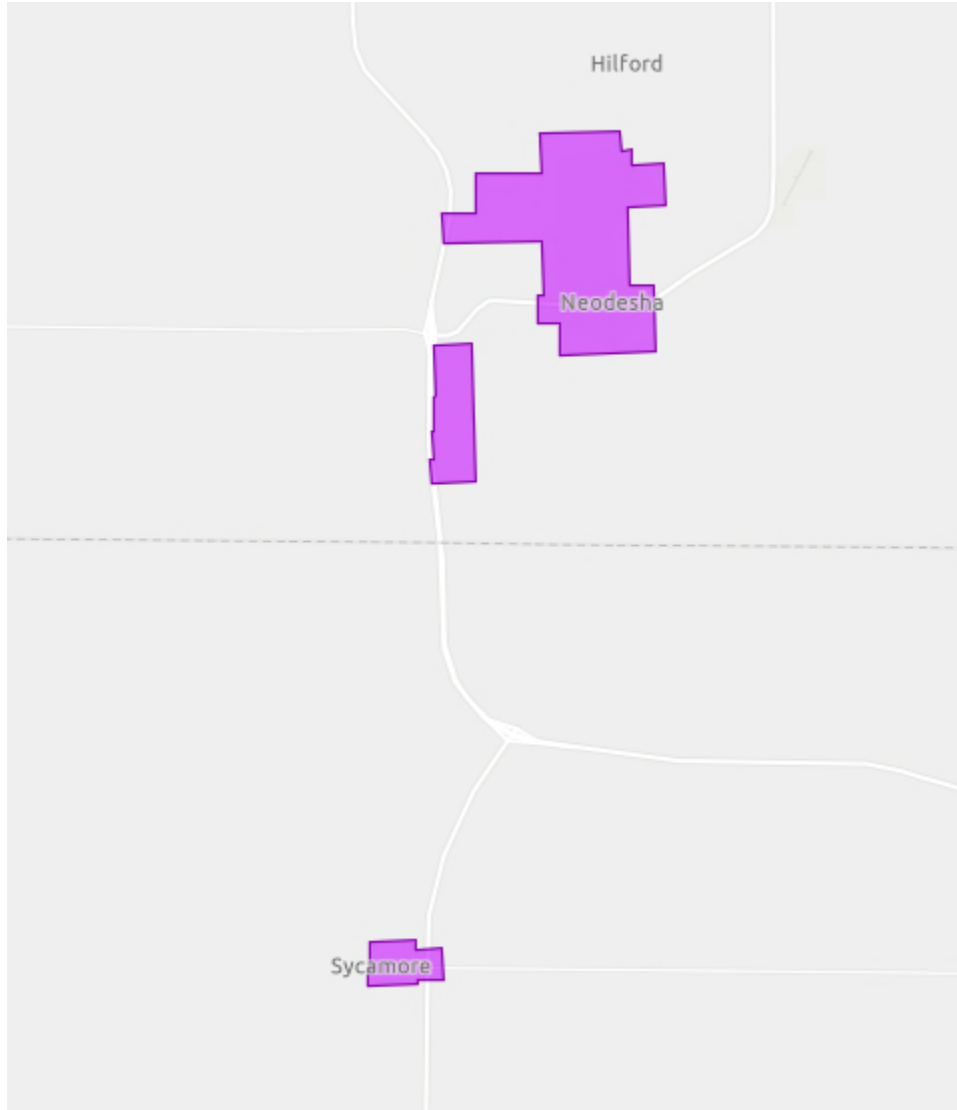
Chanute



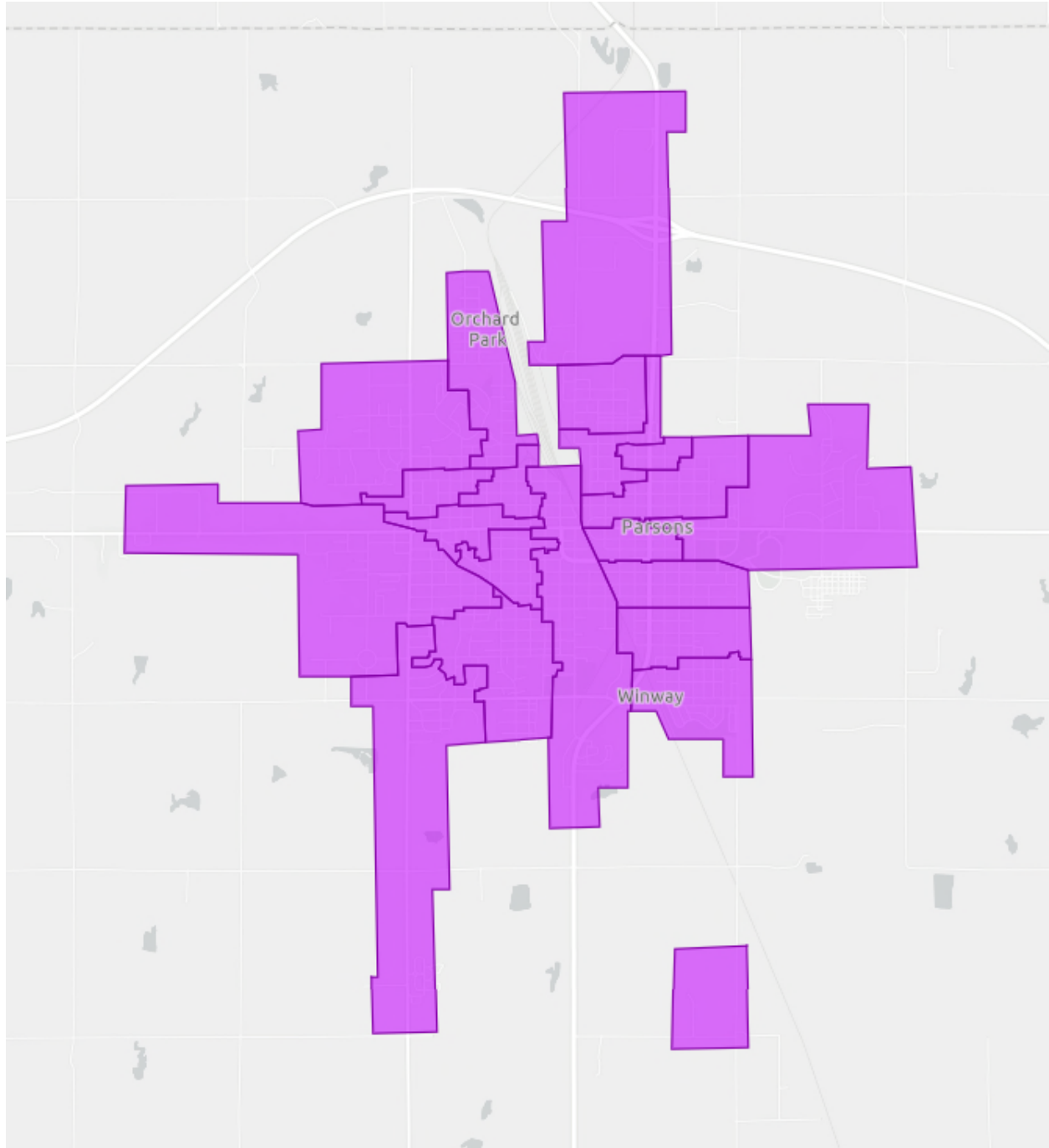
Emporia



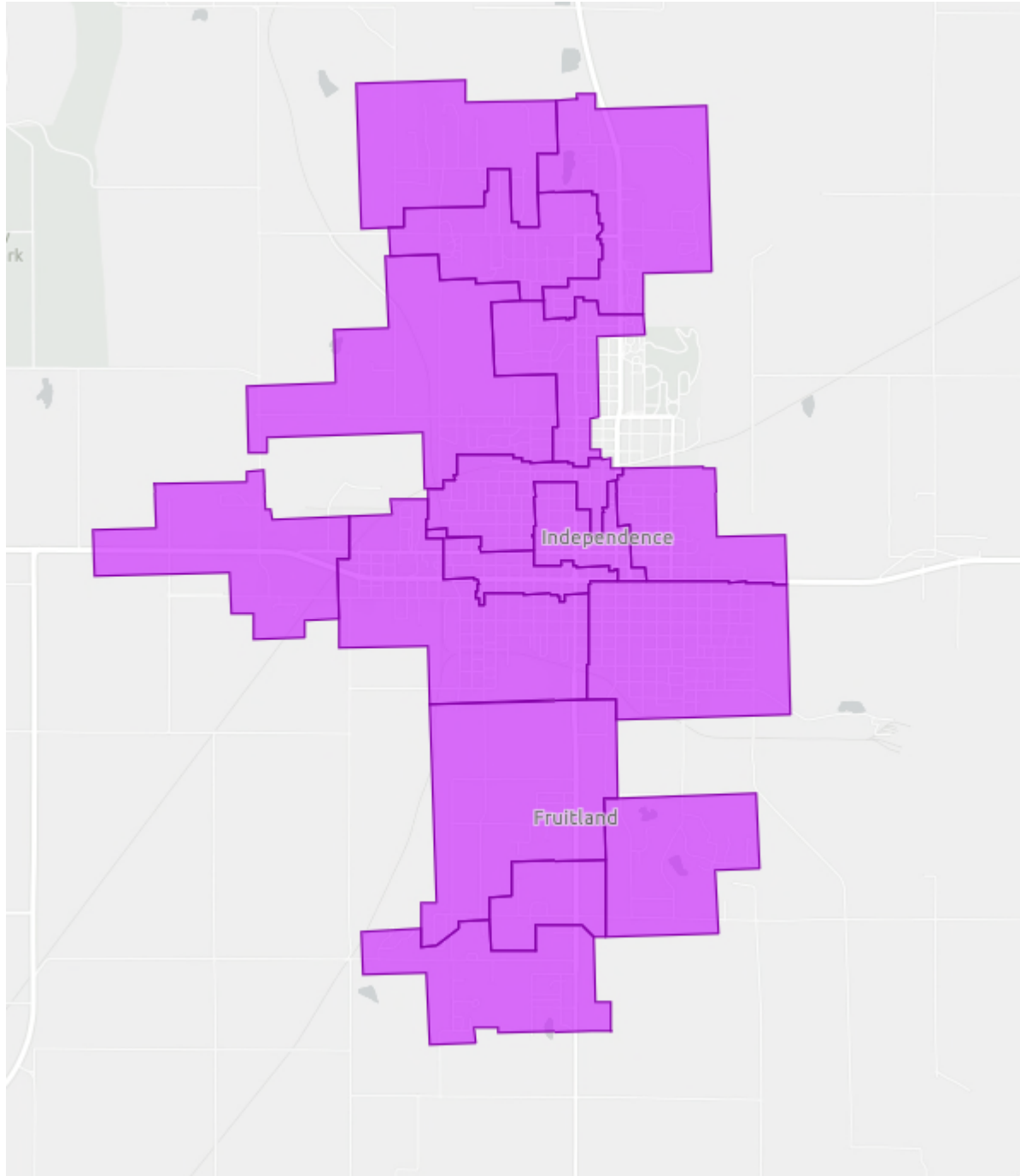
Neodesha, Sycamore



Orchard Park, Parsons, Winway



Independence, Fruitland



Baxter Junction, Baxter Springs, Commonwealth

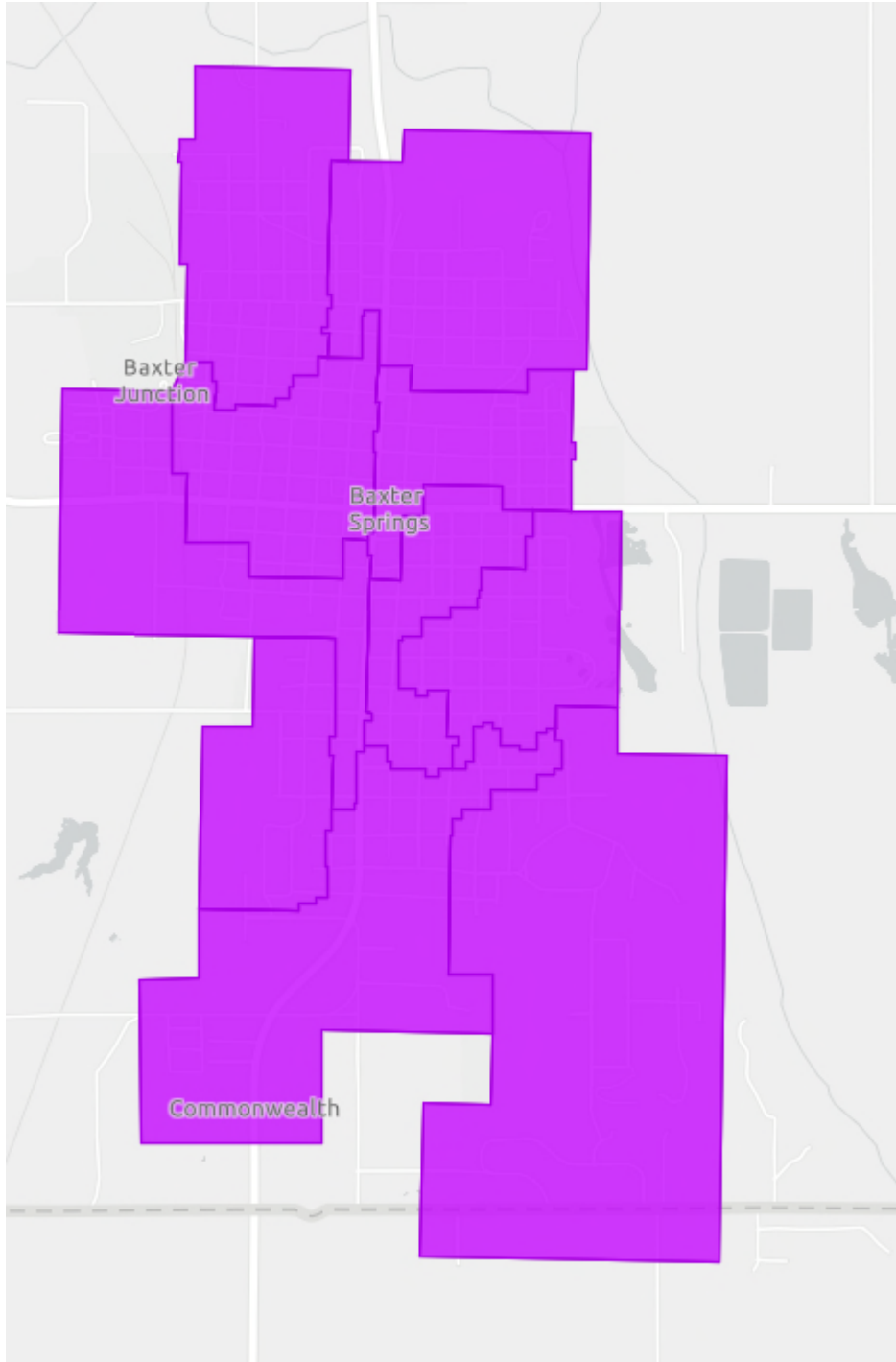


EXHIBIT 2

Kansas Secretary of State Documentation

STATE OF KANSAS
OFFICE OF
SECRETARY OF STATE
SCOTT SCHWAB

I, SCOTT SCHWAB, Secretary of State of the state of Kansas, do hereby certify, that according to the records of this office.

Business Entity ID Number: 5441563

Entity Name: CABLE ONE VOIP LLC

Entity Type: FOR: LTD LIABILITY COMPANY

State of Organization: DE

was filed in this office on April 13, 2021, and is in good standing, having fully complied with all requirements of this office.

No information is available from this office regarding the financial condition, business activity or practices of this entity.



In testimony whereof I execute this certificate and affix the seal of the Secretary of State of the state of Kansas on this day of April 15, 2021

SCOTT SCHWAB
SECRETARY OF STATE

Certificate ID: 1173200 - To verify the validity of this certificate please visit <https://www.kansas.gov/bess/flow/validate> and enter the certificate ID number.

EXHIBIT 3

Officers of Cable One VoIP LLC

As of January 1, 2021, the following are the officers of Cable One VoIP LLC:

Julia M. Laulis, President & Chief Executive Officer

Laulis joined Cable One in 1999 as Director of Marketing-NW Division. In 2001, she was named Vice President of Operations for the SW Division. In 2004, she became responsible for starting Cable One's Phoenix Customer Care Center. Laulis was named Chief Operations Officer in 2008, responsible for the company's three operation divisions and two call centers. In 2012, Laulis was named Chief Operating Officer, adding sales, marketing, and technology to her responsibilities. In 2015, Laulis was promoted to President and Chief Operating Officer of Cable One. In 2017, she was named President and Chief Executive Officer and in 2018 she was named Chair of the Board. Prior to joining Cable One, Laulis was with Jones Communications in the Washington, DC area and Denver, where she served in various marketing management positions. Laulis began her 35-year career in the cable industry with Hauser Communications. Laulis graduated from Indiana University in Bloomington with a bachelor's degree in Telecommunications. She attended the Woman in Cable Television Betsy Magness Leadership Institute in 1998/1999 and graduated from the Program for Management Development at the Harvard Business School in 2002. Cable FAX Magazine has named Laulis one of the Most Powerful Women in Cable for the past 10 years running. Laulis currently serves on the boards of The AES Corporation, CableLabs, The Cable Center, and C-SPAN and is a trustee of the C-SPAN Education Foundation.

Michael E. Bowker, Vice President

Mike Bowker is Chief Operating Officer for Cable One. He is responsible for overseeing Cable One's daily operations, technology, and residential and business channels. Bowker joined Cable One in 1999 as Advertising Regional Sales Manager. He is a member of the team that successfully launched the commercial sales division and the residential inbound sales call center. Bowker has been a Vice President of Cable One since 2005. He was named Vice President of Sales in 2012 and was promoted to Senior Vice President, Chief Sales and Marketing Officer in 2014. Prior to joining Cable One, Bowker was with AT&T Media Services and TCI Cable, where he served in various sales management positions. A native of Boise, Idaho, Bowker holds a bachelor's degree in Communication from Boise State University and is a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Bowker currently serves as Vice Chairman of ACA — America's Communications Association.

Steven S. Cochran, Vice President

Steven Cochran is Senior Vice President and Chief Financial Officer at Cable One. He is responsible for the areas of accounting, reporting, finance, and investor relations. A veteran of the cable industry, Cochran spent 15 years at Wide Open West (WOW), a Denver-based cable operator. During his tenure at WOW, Cochran held positions of increasing responsibility, including Chief Financial Officer, Chief Operating Officer, and President and Chief Executive Officer. Prior to WOW, Cochran was Senior Vice President and Chief Financial Officer at Millennium Digital Media. Cochran holds a master's degree in accounting science and a bachelor's degree in economics from the University of Illinois—Urbana Champaign

Jarrold L. Head, Vice President

Jarrold Head is Vice President of Engineering and Construction for Cable One. He is responsible for outside plant engineering, design and construction. Before joining Cable One, Head served as Vice President of Engineering & Technical Operations for Fidelity Communications and its subsidiaries. Prior to that position, he served as Engineering Director for Fidelity, overseeing Engineering and Network Operation teams to design, implement and support Fidelity's advanced technology services. Head holds a bachelor's degree in Electrical Engineering from Missouri University of Science and Technology.

Kenneth E. Johnson, Vice President

Ken Johnson is Senior Vice President of Technology Services at Cable One. He is responsible for the strategic evolution of technology roadmaps related to products, as well as Information Technology, and Network & Engineering. Before joining Cable One, Johnson served as Chief Operating Officer and Chief Technology Officer for NewWave Communications. Prior to NewWave, Johnson was Chief Technology Officer for SureWest Communications and Everest Connections. Originally from Lenexa, Kansas, Johnson holds a bachelor's degree in Computer and Information Sciences from Friends University. Johnson currently serves on the board of the National Cable Television Cooperative.

Eric M. Lardy, Vice President & Assistant Secretary

Eric Lardy is Senior Vice President of Operations and Integration for Cable One. He is responsible for overseeing the company's day-to-day operations, acquisition integration and long-term strategic operating plans. A more than 20-year veteran in the cable industry, Lardy joined Cable One as a Pay-Per-View Manager in the Fargo, North Dakota cable system. He was later promoted to Internet Business Manager, launching dial-up and high-speed broadband services. Lardy relocated several times and held a variety of positions in Marketing, Operations, and system General Management before being promoted to Director of New Products and Service Projects in 2012. In 2014, he was named Vice President of Strategy and Finance. In 2017, he was promoted to Senior Vice President, adding oversight of human resources and business intelligence to his responsibilities. Lardy holds bachelor's degrees in Marketing and International Business from Minnesota State University and an MBA from Arizona State University.

Raymond L. Storck, Jr., Vice President & Treasurer

Ray Storck is Vice President of Finance and Treasurer for Cable One. He is responsible for all of the company's accounting functions. Before joining Cable One, Storck served as Controller at Kona Grill. Prior to that, Storck was Vice President/Controller and then Chief Financial Officer for MicroAge. Following MicroAge, Storck spent 4 years at PetSmart where he served as Vice President/Controller and then Vice President of Finance and Chief Accounting Officer. A native of Iowa, Storck holds a bachelor's degree in Accounting from the University of Northern Iowa.

Peter N. Witty, Vice President & Secretary

Peter N. Witty is Senior Vice President, General Counsel and Secretary for Cable One. He is responsible for overseeing the company's legal, regulatory and compliance functions. Witty has more than 20 years of legal experience. Before joining Cable One, he served as General Counsel and Secretary for Gas Technology Institute (GTI), a leading energy research, development and training organization. Prior to GTI, Witty spent 10 years with Abbott Laboratories, serving in various positions, including as Senior Counsel and Division Counsel. Witty also previously practiced law as an associate at Latham & Watkins LLP and Ross & Hardies (now McGuireWoods LLP). Witty holds a Juris Doctor from Notre Dame Law School and a bachelor's degree in aerospace engineering from the University of Notre Dame. He is also a graduate of the Stanford Executive Program at the Graduate School of Business at Stanford University. Prior to attending law school, Witty was an officer and helicopter pilot in the 101st Airborne Division (Air Assault), where he served during Operations Desert Shield/Desert Storm.

Additional information on the officers and directors of the Company's parent, Cable One, Inc., can be found at: <https>