



COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

D.T.C. 21-2

June 4, 2021

Petition of Charter Fiberlink MA-CCO, LLC and Time Warner Cable Information Services (Massachusetts), LLC for Designation as an Eligible Telecommunications Carrier.

ORDER APPROVING PETITION

I. INTRODUCTION AND PROCEDURAL HISTORY

In this Order, the Department of Telecommunications and Cable (“Department”) grants Charter Fiberlink MA-CCO, LLC’s (“Charter Fiberlink”) and Time Warner Cable Information Services (Massachusetts), LLC’s (“Time Warner”) (together “Charter”) joint petition (“Petition”) for designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to 47 U.S.C. § 214(e)(2) in 1,264 census blocks within the towns of Alford, Ashfield, Athol, Becket, Bernardston, Blandford, Charlemont, Chester, Chesterfield, Colrain, Cummington, Egremont, Erving, Florida, Goshen, Hancock, Hawley, Heath, Lanesborough, Leyden, Middlefield, Monroe, Monterey, Mount Washington, New Ashford, New Salem, Orange, Otis, Petersham, Plainfield, Rowe, Royalston, Russell, Sandisfield, Savoy, Shelburne, Shutesbury, Tolland, Tyngham, Warwick, Washington, Wendell, Westfield, Windsor, and Worthington, Massachusetts (the “Service Area”).¹ Charter seeks ETC designation for Charter Fiberlink in the

¹ On May 11, 2021, Charter filed a Petition for Waiver with the Federal Communications Commission (“FCC”) seeking “a limited waiver of its RDOF application and deployment obligations in Massachusetts.” Charter corrected this Petition for Waiver by letter to the FCC on May 13, 2021. Letter from Maureen O’Connell, Vice President, Regulatory Affairs, to Marlene Dortch, Sec’y, FCC (May 13, 2021) p. 4 (“Waiver Petition Erratum”) (as corrected, “Petition for Waiver”). Through the Petition for Waiver, Charter seeks relief from its RDOF obligations in the Service Area with respect to 33 census block groups, and from some locations in two additional census block groups. The Petition for Waiver is currently pending.

39 census blocks listed in Exhibit A attached hereto and seeks ETC designation for Time Warner in the 1,225 census blocks listed in Exhibit B attached hereto.

Charter requests ETC designation in order to permit it to receive funding that it was provisionally awarded under the FCC's Rural Digital Opportunity Fund Auction ("RDOF Auction"). *See FCC Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes*, Public Notice, DA 20-1422 (Dec. 7, 2020) at Attachment A, p. 4 ("*Auction Results Notice*"). Charter intends to use these funds to offer voice and broadband services to unserved and underserved locations in the Service Area. Petition at 5. The Department grants Charter's Petition, subject to the conditions set forth below, because Charter meets the standards that must be applied when evaluating any prospective ETC. *See* 47 C.F.R. §§ 54.201-54.207; *Fed.-State J. Bd. on Universal Serv., Rep. & Order*, FCC 05-46 (rel. Mar. 17, 2005) ("*Universal Service Order*"); *In re Connect Am. Fund, Rep. & Order & Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*"); *In re Connect Am. Fund, Rep. & Order & Further Notice of Proposed Rulemaking*, FCC 16-64 (rel. May 26, 2016) ("*CAF II Order*"); *In re Rural Digital Opportunity Fund, Rep. & Order*, FCC 20-5 (rel. Feb. 7, 2020) ("*RDOF Order*").

The Department further grants Charter's Motions for Protection from Public Disclosure, subject to the conditions discussed below.

Charter filed the Petition on January 6, 2021, requesting to be designated as an ETC in the Service Area for the purpose of receiving funding awarded through the RDOF Auction. On the same date, Charter submitted a motion for protection from public disclosure for Exhibit H of the Petition ("First Motion for Protective Treatment"). On February 4, 2021, the Department issued an Order of Notice which required Charter to publish a Notice of Public Hearing in the

Berkshire Eagle, the Springfield Republican, and the Greenfield Recorder by February 17, 2021, and to provide the Department with proof of publication by March 17, 2021. On March 17, 2021, Charter filed proof of publication in the Berkshire Eagle on February 19, 2021, in the Springfield Republican on February 18, 2021, and in the Greenfield Recorder on February 19, 2021. In its proof of publication, Charter stated that it had failed to meet the Department's deadline for publication in all three newspapers "due to the production schedules of the various papers." Certificate of Publication of Notice of Public Hearing, D.T.C. Docket 21-2. In the absence of evidence that the reduction in the time between publication and the public hearing damaged the public's ability to participate in the hearing, and given the opportunity the public had to provide written comment, including two extensions to the time for such opportunity, the Department accepts Charter's Certificate of Publication of Notice of Public Hearing.

On February 25, 2021, the Department issued its First Set of Information Requests to Charter, requiring a response from Charter by March 12, 2021 ("First IRs"). On March 5, 2021, Charter filed a motion for an extension of time to file its responses to the First IRs to March 19, 2021. The Department granted this request on March 5, 2021, extending the response deadline contained in the First IRs to March 19, 2021. On March 19, 2021, Charter submitted responses to the majority of the questions contained in the First IRs along with a motion for a further extension of time to file its remaining responses to March 24, 2021, and a motion for protection from public disclosure relating to its response to IR 1-21 ("Second Motion for Protective Treatment"). On March 24, 2021, Charter filed a motion for a third extension of time to file its remaining responses to March 25, 2021. On March 25, 2021, the Department granted Charter's motions for extensions of time. Charter filed its responses to the remaining information requests contained in the First IRs on March 25, 2021, along with and a motion for protection from public

disclosure relating to its responses to IR 1-8 and IR 1-10 (“Third Motion for Protective Treatment”).

On April 16, 2021, the Department issued its Second Set of Information Requests to Charter, requiring a response from Charter by April 30, 2021 (“Second IRs”). On April 29, 2021, Charter filed responses to two of the five questions contained in the Second IRs. On April 30, 2021, Charter filed a motion for an extension of time to file its remaining responses to the Second IRs to May 3, 2021. Charter filed its responses to the remaining information requests contained in the Second IRs on May 3, 2021. In the absence of evidence that the delay in filing its responses to the Second IRs damaged the public or the Department’s ability to consider the Petition, the Department hereby grants Charter’s motion for an extension of time to file its responses to the Second IRs.

On March 24, 2021, the Department held a public hearing on the Petition. There were no public comments submitted during the public hearing and the Department did not receive written comments on the Petition. No parties intervened in this proceeding.

On May 27, 2021, Charter filed a Request to Amend Petition (“Amendment”), asking the Department to adopt a procedure and timeline for potential modifications of the Service Area.

II. MOTIONS FOR PROTECTION FROM PUBLIC DISCLOSURE

Charter seeks protective treatment for Exhibit H of the Petition and for its responses to three information requests issued by the Department in its First IRs. The Department, pursuant to G.L. c. 25C, § 5, may protect from public disclosure trade secrets, confidential, competitively sensitive or other proprietary information provided during the course of proceedings. For the reasons discussed below, the Department determines that Charter has established sufficient grounds to afford this information protection from public disclosure.

A. Standard

All documents and data received by the Department are generally considered public records and, therefore, are to be made available for public review under a general statutory mandate. *See* G.L. c. 66, § 10; G.L. c. 4, § 7(26). “Public records” include “all books, papers, maps, photographs, recorded tapes, financial statements, statistical tabulations, or other documentary materials or data, regardless of physical form or characteristics, made or received by any officer or employee of any agency, executive office, department, board, commission, bureau, division or authority of the commonwealth, or of any political subdivision thereof, or of any authority established by the general court to serve a public purpose unless such materials or data fall within [certain enumerated] exemptions.” G.L. c. 4, § 7(26). Materials that are “specifically or by necessary implication exempted from disclosure by statute” are excluded from the definition of “public records.” *Id.* § 7(26)(a).

The Department is permitted to “protect from public disclosure trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of proceedings conducted pursuant to this chapter.” G.L. c. 25C, § 5. In applying this exception, there is a presumption that “the information for which such protection is sought is public information and the burden shall be upon the proponent of such protection to prove the need for such protection.” *Id.*

Chapter 25C, § 5 provides a three-part standard for determining whether, and to what extent, information filed by a party in the course of a Department proceeding may be protected from public disclosure. First, the information for which protection is sought must constitute “trade secrets, confidential, competitively sensitive or other proprietary information.” Second, the party seeking protection must overcome the statutory presumption that all such information is

public by “proving” the need for its non-disclosure. *See* G.L. c. 66, § 10. Third, even where a party proves such need, the Department may protect only so much of that information as is necessary to meet the established need and may limit the term or length of time such protection will be in effect. *See Investigation by the Dep’t of Telecomms. & Energy on its own Motion into the Appropriate Regulatory Plan to succeed Price Cap Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts’ intrastate retail telecomms. servs. in the Commw. of Mass., D.T.E. 01-31 Phase I, Hearing Officer Ruling on Verizon Massachusetts’ Motions for Confidential Treatment* at 2-3 (Aug. 29, 2001) (citing G.L. c. 25, § 5D, the prior applicable standard, which contains the same language as G.L. c. 25C, §5).

B. First Motion for Protective Treatment

On January 6, 2021, Charter filed its First Motion for Protective Treatment seeking to protect Exhibit H of the Petition. As support for its Motion, Charter contends the information for which it seeks protection constitutes proprietary and competitively sensitive information because: (1) the RDOF auction rules and 47 C.F.R. § 1.21002 prohibited Charter from disclosing the information contained in Exhibit H; (2) it concerns Charter’s planned investment to install the equipment necessary to provide the services that Charter has promised in the Petition and its responses to the First IRs and to the Second IRs to provide in the Service Area; (3) the information’s disclosure could place Charter at a competitive disadvantage by providing its competitors with valuable information about Charter; (4) it is information Charter does not otherwise make publicly available and that Charter takes affirmative steps to protect; and (5) Charter’s interest in maintaining the confidentiality of the data far outweighs any benefit obtained through public disclosure.

As to the first prong of the Department's standard, the Department has previously recognized the competitively sensitive nature of corporate financial information. *See, e.g., In re T-Mobile Ne. LLC*, D.T.C. 12-4, *Order* at 7 (Aug. 30, 2012) ("*T-Mobile Order*"); *In re Nexus Commc'ns, Inc.*, D.T.C. 11-7, *Hearing Officer Ruling on Motion for Protection from Pub. Disclosure* at 3 (July 3, 2013); *In re BLC Mgmt., LLC d/b/a Angles Commc'ns Solutions*, D.T.C. 09-2, *Order* at 5-6 (Aug. 23, 2010) ("*Angles Order*"). Accordingly, the Department finds that Charter's financial-investment information contained in Exhibit H of the Petition is competitively sensitive to Charter.

As to the second prong, the Department has long held it will not automatically grant requests for protective treatment, stating that "[c]laims of competitive harm resulting from public disclosure, without further explanation, have never satisfied the Department's statutory requirement of proof of harm." *See In re CoxCom, Inc. d/b/a Cox Commc'ns New England*, D.T.C. 08-8, *Hearing Officer Ruling on Motion of CoxCom, Inc., d/b/a Cox Commc'ns New England for Protective Order* (June 23, 2009) ("*CoxCom Ruling*"). The Department accepts Charter's assertion that it does not make this information available to the public. First Motion at 3. Charter next argues that the information it seeks to protect could be used by competitors of Charter in future FCC auctions, which would negatively affect Charter's business interests. The Department has found that the likelihood of a negative financial impact to the petitioner in the future as a result of the current disclosure of confidential information warrants protection from public disclosure. *See In re Cambridge Elec. Light Co.*, D.P.U/D.T.E. 97-111, *Order* at 10-11 (July 3, 2013) (finding that disclosure of information related to electric utilities' efforts to reduce purchased power contracts would reduce the utilities' ability to negotiate such reductions in the future). In addition, the Department has protected from public disclosure the amount of capital

expenditure a provider plans to allow it to provide the services it has promised in an ETC petition. *See T-Mobile Order* at 8. As Charter is also seeking to protect the amount of its planned capital expenditures, which was information to which the Department granted confidentiality in *T-Mobile*, the Department finds that Charter has satisfied its burden to demonstrate that protection of this competitively sensitive information is warranted.

Turning to the third prong, protection should be afforded only to the extent needed. Charter requests that the Department hold the information contained in Exhibit H confidential for a period of at least five years. First Motion at 4. The Department determines that such a limitation on the protection is appropriate. Accordingly, the Department grants confidential treatment to Exhibit H of the Petition for a period of five years from the date of this Order. Charter may renew its request for confidential treatment at the end of that five-year period with a showing of need for continuing protection. *See In re CRC Commc'ns, LLC d/b/a OTELCO*, D.T.C. 18-6, *Order Approving Petition* at 7-8 (Feb. 15, 2019) (granting confidential treatment of certain information required of CAF II auction winning bidders for a period of five years and affording the provider an opportunity to renew its request for confidential treatment at the end of the period); *In re Cox Com, Inc. d/b/a Cox Commc'ns New England*, D.T.C. 07-10, *Hearing Officer Ruling* at 5-6 (May 30, 2008) (granting confidential treatment of certain information for a period of five years and affording the provider an opportunity to renew its request for confidential treatment at the end of the period).

In sum, the Department concludes that Charter has satisfied its burden of showing a need for protection from public disclosure under the statute, and the Department grants Charter's First

Motion for Protective Treatment of Confidential Information subject to the limitations described above.²

C. Second and Third Motions for Protective Treatment

On March 19, 2021, Charter filed its Second Motion for Protective Treatment seeking to protect its response to IR 1-21, which requested copies of Charter's Form 183 (RDOF Short Form) and Form 683 (RDOF Long Form).³ Second Motion at 1. Charter initially filed these Forms with the FCC as a requirement of the Company's participation in the RDOF Auction. As support for its Second Motion for Protective Treatment, Charter contends that the information for which it seeks protection constitutes proprietary and competitively sensitive information because: (1) it concerns Charter's planned network facilities; (2) the information's disclosure could place Charter at a competitive disadvantage by providing its competitors with valuable information about Charter; (3) it is information Charter does not otherwise make publicly available and that Charter takes affirmative steps to protect; and (4) Charter's interest in maintaining the confidentiality of the data far outweighs any benefit obtained through public disclosure.

On March 25, 2021, Charter filed its Third Motion for Protective Treatment seeking to protect the following: IR 1-8, in response to which Charter filed an organizational chart describing the ownership structure of Charter Fiberlink and qualifying affiliates, originally part

² The Department may reconsider this ruling if the FCC at any point discloses the information publicly.

³ Where an RDOF auction winner has assigned its winning bids to more than one operating companies under its control, pursuant to Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020, Pub. Notice, FCC 20-77, ¶ 292 (rel. June 11, 2020) ("RDOF Procedure Notice"), and will carry out its RDOF public interest obligations through multiple operating companies in the same state, it may choose one of those entities to act as the "lead operating company." *Id.* This lead operating company is responsible for submitting a long-form application for FCC approval in that state. *See id.* Here, the Charter subsidiary that participated in the auction, CCO Holdings, LLC, has designated Time Warner as its lead operating company for Massachusetts. *417 Long-Form Applicants In The Rural Digital Opportunity Fund Phase I Auction (Auction 904), Public Notice*, DA 21-170 (rel. Feb. 18, 2021).

of Charter's Form 683; IR 1-10, in response to which Charter filed an organizational chart describing the ownership structure of Time Warner and qualifying affiliates, originally part of Charter's Form 683. Third Motion at 1. As support for its Third Motion for Protective Treatment, Charter contends that the information for which it seeks protection constitutes proprietary and competitively sensitive information because: (1) it concerns confidential information regarding parent and affiliated companies; (2) the information's disclosure could place Charter at a competitive disadvantage by providing its competitors with valuable information about Charter; (3) it is information Charter does not otherwise make publicly available and that Charter takes affirmative steps to protect; and (4) Charter's interest in maintaining the confidentiality of the data far outweighs any benefit obtained through public disclosure.

As these two Motions seek protective treatment for portions of the same underlying documents, Charter's Forms 183 and 683, the Department analyzes them together.

As to the first prong of the Department's confidentiality standard, the Department has previously recognized the competitively sensitive nature of facilities location information, equipment information, network structure information. *See In re YourTel Am., Inc.*, D.T.C. 11-1, *Hearing Officer Ruling on Motion for Protection from Pub. Disclosure* at 3-5 (July 6, 2011) ("*YourTel Ruling*") (summarizing previous Department rulings concerning facility location, equipment, and network structure and concluding that disclosure of such information could put a carrier at a competitive disadvantage). The Department has also recognized the competitively sensitive nature of companies' confidential calculations, financial materials, and personnel information. *See Angles Order* at 5-6; *In re Time Warner Cable, Inc.*, CTV 04-5 Phase II, *Rate Order*, (Nov. 30, 2005) (finding that personnel information, including the number of and total

compensation paid employees are competitively sensitive). Here, Charter seeks to protect a description of its planned facilities and of its corporate structure and ownership. The Department finds this information to be competitively sensitive. Accordingly, the Department finds that the information contained in Charter's response to IR 1-8, IR 1-10, and IR 1-21 for which Charter seeks protection is competitively sensitive to Charter.

As to the second prong, the Department has long held it will not automatically grant requests for protective treatment, stating that "[c]laims of competitive harm resulting from public disclosure, without further explanation, have never satisfied the Department's statutory requirement of proof of harm." *See CoxCom Ruling*. The Department accepts Charter's assertion that it does not make this information available to the public. Second Motion at 2-3. Moreover, although some information in Charter's corporate organizational charts is public information, the overall relationship between the corporate entities depicted in these corporate organizational charts, which contain a mix of both public and private entities, is not public information. Furthermore, the Department has consistently found the type of information Charter seeks to protect to warrant protection from public disclosure given the potential for competitive harms in the event of disclosure. *See YourTel Ruling; Angles Order*. Accordingly, the Department finds that Charter has satisfied its burden to demonstrate that protection of the competitively sensitive information is warranted.

Turning to the third prong, protection should be afforded only to the extent needed. Charter requests that the Department hold this information confidential for a period of at least five years. Second Motion at 3; Third Motion at 3. The Department agrees that a limitation on the protection Charter seeks for portions of its Short Form and Long Form applications is appropriate. Therefore, the Department grants confidential treatment to Charter's responses to

IR 1-8, IR-10, and IR 1-21 for a period of five years from the date of this Order. Charter may renew its request for confidential treatment at the end of that five-year period with a showing of need for continuing protection. *See In re Cox Com, Inc. d/b/a Cox Commc'ns New England*, D.T.C. 07-10, *Hearing Officer Ruling* at 5-6 (May 30, 2008) (granting confidential treatment of certain information for a period of five years and affording the provider an opportunity to renew its request for confidential treatment at the end of the period).

In sum, the Department concludes that Charter has satisfied its burden of showing a need for protection from public disclosure under the statute, and the Department grants Charter's Second and Third Motions for Protective Treatment of Confidential Information subject to the limitations described above.⁴

III. PETITION FOR ETC DESIGNATION

Charter has petitioned the Department for ETC designation in the Service Area in order to receive RDOF Auction funding to provide service to high-cost locations. State commissions, upon request and consistent with the public interest, convenience, and necessity, shall designate a common carrier as an ETC for a service area designated by the state commission if the carrier meets certain federal requirements. 47 U.S.C. § 214(e). The FCC has emphasized that state commissions should conduct a rigorous ETC designation process. *Universal Service Order*, ¶ 58. The Department grants Charter's Petition, subject to the conditions specified herein.

A. Jurisdiction

In Massachusetts, the Department exercises jurisdiction over carriers pursuant to G.L. c. 159, § 12. *See In re City of Westfield Gas + Elec. Light Dep't*, D.T.C. 19-1, *Order Approving Petition* (Feb. 19, 2019); *Investigation by the Dep't on its Own Motion into the Implementation*

⁴ The Department may reconsider this ruling if the FCC at any point discloses the information publicly.

in Mass. of the Fed. Commc'ns Comm'n's Order Reforming the Lifeline Program, D.T.C. 13-4, *Order Opening Investigation* (Apr. 1, 2013); *Investigation by the Dep't on its Own Motion into the Lifeline & Link-Up Programs for Mass. Tel. Customers*, D.T.C. 10-3, *Order Opening Investigation* (Sept. 17, 2010); *T-Mobile Order*. Further, federal law grants the Department the authority to designate a carrier as an ETC. 47 U.S.C. § 214(e)(2). Accordingly, it is the Department's responsibility to determine whether a carrier such as Charter meets the ETC designation requirements. *See* Petition at 2 (asserting that the Department has jurisdiction to review and approve the Petition).

B. RDOF Phase I

The FCC's RDOF Auction ran from October 29 to November 25, 2021 and awarded Universal Service Fund ("USF") high-cost support to bidders in 49 states to provide broadband and voice services to unserved and underserved locations. *Auction Results Notice*, Attachment A at 4, Attachment B (Dec. 7, 2020). Bidders were required to select from four broadband service tiers for speed and usage allowance, and two latency tiers, and certify that they would provide the services associated with their respective bids. *RDOF Order*, ¶¶ 31-33. Charter submitted bids to provide service in Massachusetts. Petition at 2. On December 7, 2020, the FCC provisionally awarded Charter \$21,639,762.70 to be disbursed over a 10-year period, for Charter to provide RDOF-supported services in the Massachusetts census blocks listed in the Petition. *Auction Results Notice*, Attachment A at 4.⁵

⁵ CCO Holdings, LLC was the winning bidder for the census blocks in the Service Area and later assigned each of these bids to either Charter Fiberlink or Time Warner, both of which are majority owned and wholly controlled subsidiaries of CCO Holdings, LLC. Petition at 2, 3. Time Warner, the lead operating company, filed the long-form applications for both of these Charter entities. *See* FCC, *Long-Form Applicants Spreadsheet* (listing long-form applicants to RDOF Auction) (last visited May 27, 2021). Nevertheless, each of Charter Fiberlink and Time Warner must receive ETC designation in the census blocks for which it will be responsible for meeting the required obligations. *RDOF Procedure Notice* ¶ 292.

C. Service Area

Charter seeks to qualify the census blocks for which it seeks ETC designation, in various ways. First, although Charter has petitioned for ETC designation in those census blocks listed in its Petition (Exhibits A and B), it actually seeks ETC designation in those census blocks which the FCC assigned to CCO Holdings, LLC in Massachusetts as specified in the FCC's RDOF Dashboard, which Charter notes is available at <https://auctiondata.fcc.gov/public/projects/auction904>. Petition at Exhibit A n.1, Exhibit B n.1; *Response of Charter to the First IRs* at Exhibit 1 n.2; *Response of Charter to the Second IRs* at Exhibit 10 n.2; Amendment at 2 n.5. Second, Charter asks that after any ETC designation, the Department change the Service Area if the FCC "modifies" Charter's RDOF census blocks in Massachusetts. *Response of Charter to the First IRs* at Exhibit 1 n.2; *Response of Charter to the Second IRs* at Exhibit 10 n.2; Amendment at 2 n.5. One reason for such a modification, Charter notes, would be in response to the Petition for Waiver. *See* Amendment. The Department addresses these requests *infra* Section III.F.

D. ETC Requirements

Only a carrier designated as an ETC is eligible to receive high-cost USF support.⁶ 47 U.S.C. §§ 214(e), 254(e); 47 C.F.R. § 54.201. In order for the Department to grant Charter's request for ETC designation, Charter must:

- 1) Be a "common carrier" as defined by federal law. 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d).
- 2) Offer the required supported services in its designated service area using its own facilities or a combination of its own facilities and resale of services from another provider. 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.101. Required supported services include: voice grade access to the public switched network or its functional

⁶ Charter seeks ETC designation for the purpose of receiving high-cost USF support, and will also receive Lifeline funds to the extent that it is providing Lifeline service to verified low-income subscribers.

- equivalent; minutes of use for local service provided at no additional charge to end users; access to emergency services (911 or enhanced 911 (“E911”)), to the extent implemented; toll limitation services for qualifying low-income consumers if the carrier distinguishes between toll and non-toll calls in pricing of the service; and broadband internet access with 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. *USF/ICC Transformation Order*, ¶¶ 75-80; 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. §§ 54.101, 54.201(d)(1), 54.401(a)(2), 54.405(a).
- 3) Advertise the availability of supported services and “the charges therefor using media of general distribution” throughout its designated service area (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2)), and “[p]ublicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.” 47 C.F.R. § 54.405(b).⁷
 - 4) Certify its commitment and ability to meet the service and performance quality requirements applicable to the type of USF support it receives. 47 C.F.R. § 54.202(a)(1)(i).⁸
 - 5) Demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. 47 C.F.R. § 54.202(a)(2).
 - 6) Certify that it will comply with federal Lifeline procedures and requirements in accordance with established effective dates; and additional requirements imposed by the Department, as discussed below.
 - 7) Demonstrate that its designation as an ETC is consistent with the public interest, convenience, and necessity. 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.202(b).

⁷ ETCs must disclose on all materials describing Lifeline service that the ETC is offering the service; the offer is a Lifeline service; Lifeline is a government program; the service is non-transferable; only eligible consumers may enroll in the program; and the program is limited to one discount per household. *See* 47 C.F.R. § 54.405(c), (d).

⁸ While 47 C.F.R. § 54.202 establishes requirements for ETC designation by the FCC, the Department applies these criteria to applicants for ETC designation by the Department. *In re Virgin Mobile USA, L.P.*, D.T.C. 10-11, *Order Approving Petition* at 5 (Sept. 9, 2011) (“*Virgin Mobile Order*”); *T-Mobile Order* at 17-19. The FCC has waived the requirement that a petitioner seeking ETC status to receive RDOF funds submit a five-year improvement plan. *Auction Results Notice* ¶ 36 n.71.

E. Analysis

The Department finds that Charter satisfies the requirements listed above. Furthermore, the Department finds that Charter's designation as an ETC in the Service Area is consistent with the public interest, convenience, and necessity. Accordingly, the Department grants Charter ETC designation in the Service Area for the reasons discussed below.

1. Charter is a common carrier.

To meet the first ETC requirement, Charter must establish that it is a common carrier. 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d). "Common carrier" is defined as "any person engaged as a common carrier for hire, in interstate or foreign communications by wire or radio" 47 U.S.C. § 153(11). Charter states that both Charter Fiberlink and Time Warner are registered telecommunications providers with the Department. Charter Response to IR-12. Both Charter Fiberlink and Time Warner are authorized by the Department to provide local exchange services. *See* Petition at Exhibits F, G. The Department agrees and finds that both Charter Fiberlink and Time Warner are registered telecommunications services providers and therefore "common carriers." *See* G.L. c. 159, § 19.

2. Charter will offer the supported services throughout the Service Area, including offering Lifeline services to low-income customers.

Charter must demonstrate that it will offer the supported services throughout the Service Area. *RDOF Order*, ¶¶ 31-66; 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. §§ 54.101(a), 54.201(d)(1), 54.405(a). Charter has certified that it will provide supported services using its own facilities. Petition at 5, 12-15; *see also* 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1). "Supported services" include qualifying broadband services; voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to emergency services (911 or E911), to the extent implemented; and

toll limitation services for qualifying low-income consumers if the carrier distinguishes between toll and non-toll calls in pricing of the service. *See* 47 C.F.R. §§ 54.101, 54.401(a)(2); *USF/ICC Transformation Order*, ¶ 86.

Charter has stated that it will offer the supported services using its own facilities. Petition at 5. Specifically, Charter states that it will use its own network, gateways, switching facilities, and other associated facilities to provide service in the Service Area. *Id.* at 13. Further, Charter states that it will use RDOF funding to support its construction of a fiber optic network to provide broadband and voice service to the areas in which Charter has been awarded support.⁹

IR 1-24. Charter plans to provide low-latency internet service at several speeds, up to and including 1 Gbps. Petition at 7; IR 2-2, Exhibit 12. Charter will offer voice services as a standalone service at rates reasonably comparable to urban rates. Petition at 14; *see* 47 U.S.C. § 214(e)(1)(B), 47 C.F.R. § 54.201(d)(2). Further, Charter will provide eligible low-income customers with subsidized voice and broadband services pursuant to Lifeline requirements. Petition at 13. Charter notes that it prices its services on a nationwide basis and that current plan prices are subject to change. IR 2-2. Charter notes that it “expects that the services, prices and plans in the RDOF and non-RDOF areas of Massachusetts are likely to be the same.” IR 1-19.

With regard to subscriber access to 911 and E911, Charter states that it provides 911 service to subscribers and meets all requests for E911 service from local public safety answering points. Petition at 13.

The Department finds that Charter’s proposed plans satisfy the federal “supported services” and “own facilities” requirements. 47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.401(a)(2).

⁹ Both Charter Fiberlink and Time Warner will offer voice services over the network Charter will construct in the census blocks for which each company is responsible for providing service, through an interconnected VoIP affiliate of Charter, Spectrum Advanced Services, LLC. Both Charter Fiberlink and Time Warner will offer broadband internet service through Spectrum Northeast, LLC, a cable affiliate of Charter. IR 1-1 through IR 1-7.

The Department further finds that Charter has demonstrated that it will offer Lifeline services to eligible low-income customers throughout its Service Area in satisfaction of 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. §§ 54.101(a), 54.201(d). *See* Petition at 13 n.27.

3. *Charter will advertise the availability of the supported services in accordance with regulatory requirements.*

Charter must advertise the availability of supported services and charges therefor in media of general distribution throughout the Service Area. 47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2). Charter must also “[p]ublicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.” 47 C.F.R. § 54.405(b). Finally, Charter must disclose on all materials describing the Lifeline service that: Charter is the service provider; the offer is a Lifeline service; Lifeline is a government program; the service is non-transferable; only eligible consumers may enroll in the program; and the program is limited to one discount per household. *Id.* § 54.405(c), (d).

Charter states it will advertise the availability of, and rates and charges for, its supported service offerings using media of general distribution. Petition at 14. Charter plans to advertise its services on its Spectrum websites, through interactive voice response messages when customers call into customer support, with notices in annual bill messages, and with brochures in its retail stores in the Service Area. Charter’s Responses to IRs 1-2 and 1-5 at Exhibit 2.

The Department finds that Charter has demonstrated that it will advertise the availability of supported services in media of general distribution throughout the Service Area. Charter plans to use a variety of mass media to target potential subscribers including Lifeline-eligible customers. Charter’s advertising campaign and other outreach will increase awareness of Charter’s Lifeline offerings and promote the Lifeline program in the Service Area.

4. *Charter has certified that it will meet the service and performance quality requirements applicable to the type of USF support it receives.*

Charter has certified that it will meet the service and performance quality requirements applicable to the type of USF support it receives. *See* 47 C.F.R. § 54.202(a)(1)(i). Charter states that prior to the end of the RDOF support period, it will build out its network to reach the locations within the Service Area. Petition at 7, 13-14. Charter has certified to the FCC that it will provide the supported services to all eligible locations, as that number is determined by the FCC. *See* IR 1-21 (confidential); *RDOF Order*, ¶¶ 45-55. Charter submitted to the FCC documentation demonstrating its ability to provide services associated with the service tier and latency associated with its bid in the RDOF Auction. IR 1-21.

The Department finds that Charter has certified that it will meet the service and performance quality standards applicable to the USF support it will receive.

5. *Charter has demonstrated its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.*

Charter states that it has the ability to remain functional in emergency situations. Petition at 15; IR 1-31. Charter's switching facilities have independent power generators to ensure functionality for several days without an external power source consistent with 47 C.F.R. § 54.202(a)(2). Petition at 15. Charter states that it has contingency plans, staffing, escalation, and communications procedures in place to respond to emergencies for each of its network hubs and/or facilities. *Id.* at 12, 15; IR 1-31. Charter has designed its network with multiple levels of redundancy. Petition at 15; IR 1-31. The Department finds that Charter has demonstrated its ability to remain functional in emergency situations.

6. *Charter will comply with additional FCC and Department requirements.*

a. Federal Lifeline Procedures and Requirements

Lifeline procedures and requirements established by the FCC include:

- 1) screening applicants using the National Lifeline Accountability Database as set forth in 47 C.F.R. § 54.404(b)(1)-(12);
- 2) complying with the carrier's obligations to offer Lifeline, including de-enrollment requirements, as established in 47 C.F.R. § 54.405(a)-(e);
- 3) certifying that the carrier is prepared to comply with the subscriber eligibility determination and certification requirements established in 47 C.F.R. § 54.410(a)-(h) to the extent applicable;
- 4) complying with annual certification requirements established in 47 C.F.R. § 54.416(a), (b);
- 5) complying with recordkeeping requirements established in 47 C.F.R. § 54.417;
- 6) complying with audit requirements, to the extent applicable, established in 47 C.F.R. § 54.420; and
- 7) complying with annual reporting requirements established in 47 C.F.R. § 54.422.

Charter states that it has agreed to and will comply with the FCC's procedures and requirements. *See* Petition at 14. The Department finds that Charter will comply with applicable federal Lifeline requirements.

b. Department Requirements

Charter has also agreed to satisfy all Massachusetts-specific ETC requirements. Petition at 16-17. Charter has represented to the Department that it will comply with the relevant Lifeline requirements established by the Department. *See Investigation by the Dep't on its Own Motion into the Implementation in Mass. of the Fed. Commc'n's Comm'n's Order Reforming the Lifeline*

Program, D.T.C. 13-4, Order Implementing Requirements (Aug. 1, 2014). In particular, Charter has agreed to:

- 1) File with the Department, within 60 days of the approval of its Petition:
 - a. a copy of the Lifeline application form that it will use for consumers in Massachusetts;
 - b. copies of all advertising and marketing materials that it plans to use in Massachusetts;
 - c. its rates, terms and conditions of service, applicable to qualifying Lifeline service customers;
 - d. contact information for its customer service designee; and
 - e. its proposed methods and timing of annual Lifeline recertifications and a sample Lifeline recertification notice. Petition at 16-17.
- 2) File with the Department by March 1 of each year:
 - a. a copy of certifications filed annually with Universal Service Administrative Company pursuant to 47 C.F.R. § 54.416(a);
 - b. the number of subscribers de-enrolled for non-usage, by month, pursuant to 47 C.F.R. § 54.416(b) (FCC Form 555 or its equivalent); and
 - c. a report of marketing or promotional activities for the previous calendar year, including a description of media services used, methods of marketing, samples of advertisements published in Massachusetts, event appearances and zip codes of those events, and any other mass marketing activities conducted. *Id.*
- 3) File with the Department by July 1 of each year:
 - a. the company name, names of the company's holding company, operating companies and affiliates, and any branding as well as relevant universal service identifiers for each such entity by Study Area Code, as required by 47 C.F.R. § 54.422(a)(1) (part of FCC Form 481 or its equivalent);
 - b. information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan, as required by 47 C.F.R. § 54.422(a)(2). If the plans offered to Lifeline subscribers are also generally available to the public, Charter may provide summary information regarding such plans, such as a link to a public

website outlining the terms and conditions of such plans (part of FCC Form 481 or its equivalent); and

- c. a report of the number of complaints related to the Lifeline program during the previous calendar year per 1,000 Lifeline subscribers in Massachusetts (if not provided as part of FCC Form 481). *Id.*
- 4) Notify the Department of the following events within 30 days of any event's occurrence:
- a. Charter's ETC designation has been suspended, revoked, relinquished, or in any way withdrawn or removed in any jurisdiction;
 - b. the FCC, a state utilities commission, a court, or any government agency has rendered or entered a finding, civil judgment, or settlement (including consent decrees and money judgments) related to the Lifeline program, or a criminal conviction (including plea agreements) related to a dishonest act, false statement, or misuse of the Lifeline program against Charter, its executives, or its senior managers;
 - c. any change(s) to Charter's corporate ownership structure or principal address; and
 - d. any material change(s) to the ETC's method(s) or timing of annual recertifications, or to the sample recertification notice filed after approval of the Petition. *Id.*
- 5) Provide to the Department a copy of any final audit report generated pursuant to 47 C.F.R. § 54.420(b) within 30 days of the issuance of the final audit report. *Id.*
- 6) If it plans to discontinue offering Lifeline service in Massachusetts, (1) notify Lifeline subscribers and the Department 60 days in advance of the planned discontinuance of Lifeline service in Massachusetts, and (2) work in good faith with its Lifeline subscribers and the Department to facilitate smooth transition of subscribers to alternative ETCs of the subscribers' choice. *See id.* at 12.
- 7) Update its Massachusetts Lifeline application within 30 days of changes in eligibility criteria, including Federal Poverty Guideline calculations. *See id.*

The Department concludes that Charter is prepared to comply with federal Lifeline procedures and requirements and the additional requirements imposed by the Department.

7. *Charter's designation as an ETC is consistent with the public interest, convenience, and necessity.*

Prior to designating a common carrier as an ETC, the Department must make an affirmative finding that such designation is “consistent with the public interest, convenience, and necessity.” 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.202(b); *Universal Service Order*, ¶ 40; *T-Mobile Order* at 20-21. Charter bears the burden of proving that its designation as an ETC in the Service Area is in the public interest. *See Universal Service Order*, ¶ 44. For the reasons discussed below, the Department finds that granting Charter ETC designation is in the public interest.

“In analyzing whether a petition for ETC designation is in the public interest, the Department considers multiple factors, including the benefits of increased consumer choice and the unique advantages and disadvantages of the carrier’s service offering.” *T-Mobile Order* at 21 (quoting *Virgin Mobile Order* at 10); *see also Universal Service Order*, ¶¶ 40-44. This test must be applied in a manner consistent with the principles of preserving and advancing universal service and ensuring that quality services are available at just, reasonable, and affordable rates. 47 U.S.C. § 254(b)(1)-(2). Other factors that may be relevant in analyzing whether an ETC designation is in the public interest include: the availability of new choices for customers, affordability, quality of service, service to unserved or underserved customers, comparison of benefits relative to public cost, and considerations of material harm. *See Universal Service Order*, ¶ 40 n.111.

The Department and the Commonwealth have long recognized the importance of broadband expansion and access. *See, e.g., In re a Nat’l Broadband Plan for Our Future*, GN Docket No. 09-51, *Joint Comments of the Mass. Broadband Inst. & MDTC* at 16, 20-21 (June 8, 2009). In these 2009 Comments to the FCC, the Department and the Massachusetts Broadband Institute discussed that “broadband availability is a necessary resource to all Americans that has

quickly permeated and influences every level of our society.” *Id.* at 21. Twelve years later, access to broadband service allowed consumers, businesses, and others to maintain functions that would otherwise have been impossible when workplaces, schools, and other community institutions were physically inaccessible during the COVID-19 pandemic. Bringing federal funds into Massachusetts for the purpose of constructing and maintaining broadband infrastructure will convey an enormous public benefit to the affected communities.

In addition to the benefits of expanded broadband access, adding a fixed broadband Lifeline provider for low-income residents of the Service Area also conveys a recognized benefit. As each petitioner seeking ETC designation will likely be unique, the Department’s exercise is necessarily fact-specific to each petition. *Id.*, ¶ 46. Accordingly, the Department evaluates the particular advantages or disadvantages of the services Charter offers, the affordability of these services, and considerations of material harm in determining whether designating Charter as an ETC is in the public interest. *Id.*

Charter will offer low-latency broadband service with a range of speeds up to and including 1 Gbps/500 Mbps for both households and business subscribers. Petition at 15; IR 1-31. For communities that have never had the opportunity to subscribe to high-speed broadband service, the benefits of access to this high-speed service are significant. Charter’s expected residential monthly rates for its broadband service, based on Charter’s current nationwide rates, are between \$74.99 for 100 Mbps/10 Mbps and \$134.99 for 1 Gbps download service. IR 2-2. These rates are below the reasonable comparability benchmarks set by the FCC based upon the urban rate survey. *See* FCC, 2021 Urban Rate Survey Fixed Broadband Service Reasonable Comparability Benchmark at 10-11, <https://www.fcc.gov/file/20057/download>. Charter will also offer video service to consumers in the Service Area. IR 2-5. Finally, Charter will also offer

voice service as an add-on to internet service for \$12.99 per month or on a standalone basis for \$29.99 per month, which is below the reasonable comparability benchmarks set by the FCC based upon the urban rate survey. IR 2-2; *see* FCC, 2021 Urban Rate Survey Fixed Voice Service Reasonable Comparability Benchmark at 6, <https://www.fcc.gov/file/20055/download>. Moreover, both Charter's broadband and voice services will be available to low-income consumers with the additional benefits of the federal subsidy for Lifeline broadband or voice service. Petition at 14; IR 1-2. This may provide discounted service to eligible Lifeline households who are not yet enrolled in the Lifeline program, or will allow Lifeline subscribers to choose to apply their Lifeline benefit to high-speed fixed broadband service instead of the home phone or mobile phone services they may currently receive using this benefit.

The Department finds that Charter's plan to introduce high-speed fixed broadband service in the Service Area is consistent with the public interest. Accordingly, Charter has met its obligation to establish that its ETC designation is consistent with the public interest, convenience, and necessity.

F. Charter is designated as an ETC in the Service Area.

The Department designates Charter as an ETC in the Service Area, as defined in Exhibits A and B attached hereto. The Department has determined that the list of census blocks for which Charter seeks ETC designation in the Petition is identical to the list of census blocks assigned to Charter in the FCC's RDOF Dashboard. *See* FCC, FCC Public Reporting System, *RDOF Dashboard*, <https://auctiondata.fcc.gov/public/projects/auction904> (last visited May 27, 2021). Should the list of census blocks which the FCC has assigned to Charter in Massachusetts pursuant to the RDOF Auction change, Charter may petition the Department to change the census blocks in which it is hereby granted ETC designation. *See* 47 U.S.C. § 214(e)(5)

(granting the Department the authority and obligation to establish the “Service Area” for ETC designations); *cf.* Amendment. Further, acknowledging the Amendment, if the FCC grants Charter’s Petition for Waiver, in whole or in part, and Charter moves to remove its ETC designation from all or part of any of the census blocks in Exhibits A and B, the Department pledges to use its best efforts to issue a ruling on such motion within forty-five days of the Department’s receipt of such motion, barring unforeseen circumstances and any additional procedures that may become necessary, including, but not limited to, a timely request for a public hearing on such motion.

G. Conclusion

The Department finds that Charter has satisfied the requirements for ETC designation in the Service Area, and such designation is consistent with the public interest, convenience, and necessity. In addition to those conditions and requirements already discussed, the Department’s designation of Charter Fiberlink and Time Warner as ETCs is conditioned on Charter Fiberlink and Time Warner’s compliance with all applicable state and federal rules and regulations, including, but not limited to, RDOF program rules and regulations.

IV. ORDER

Accordingly, after notice, hearing, and consideration, it is hereby

ORDERED: the Department hereby GRANTS Charter's First Motion for Protection from Public Disclosure, subject to the limitations established above; and it is

FURTHER ORDERED: the Department hereby GRANTS Charter's Second Motion for Protection from Public Disclosure, subject to the limitations established above; and it is

FURTHER ORDERED: the Department hereby GRANTS Charter's Third Motion for Protection from Public Disclosure, subject to the limitations established above; and it is

FURTHER ORDERED: consistent with the above, the Department hereby GRANTS Charter's Petition for Designation as an Eligible Telecommunications Carrier in the Service Area established in Exhibits A and B; and it is

FURTHER ORDERED: Charter shall comply with all directives and commitments contained and referenced in this Order.

By Order of the Department,



Karen Charles Peterson, Commissioner

RIGHT OF APPEAL

Pursuant to G.L. c. 25, § 5, and G.L. c. 166A, § 2, an appeal as to matters of law from any final decision, order or ruling of the Department may be taken to the Supreme Judicial Court for the County of Suffolk by an aggrieved party in interest by the filing of a written petition asking that the Order of the Department be modified or set aside in whole or in part. Such petition for appeal shall be filed with the Secretary of the Department within twenty (20) days after the date of service of the decision, order or ruling of the Department, or within such further time as the Department may allow upon request filed prior to the expiration of the twenty (20) days after the date of service of said decision, order or ruling. Within ten (10) days after such petition has been filed, the appealing party shall enter the appeal in the Supreme Judicial Court for the County of Suffolk by filing a copy thereof with the Clerk of said Court. Appeals of Department Orders on basic service tier cable rates, associated equipment, or whether a franchising authority has acted consistently with the federal Cable Act may be brought to the Federal Communications Commission pursuant to 47 C.F.R. § 76.944.

EXHIBIT A

Service Area (in Census Blocks) for Charter Fiberlink MA-CCO, LLC's ETC Designation

250138130005001
250138130005004
250138130005005
250138130005015
250138130005020
250138130005022
250138130005023
250138130005028
250138130005030
250138130005032
250138130005034
250138130005036
250138130005037
250138130005038
250138130005039
250138130005042
250138130005043
250138130005045
250138130005046
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250138130005056
250138130005057
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250138130005059
250138130005060
250138130005062
250138130005069
250138130005071
250138130005072
250138130005073
250138130005080

EXHIBIT B
Service Area (in Census Blocks) for Time Warner Cable Information Services
(Massachusetts), LLC's ETC Designation

250039111002009	250039314001019	250039322002048	250039322002106
250039111002014	250039314001022	250039322002049	250039322002107
250039111002016	250039314001030	250039322002050	250039322002108
250039111002017	250039314001037	250039322002051	250039322002111
250039111002025	250039314001043	250039322002054	250039322002115
250039111002032	250039314001056	250039322002055	250039322002117
250039111002035	250039314001061	250039322002056	250039322002118
250039111002037	250039314001066	250039322002057	250039322002119
250039111002043	250039314001067	250039322002059	250039322002130
250039313001000	250039314001068	250039322002060	250039322002131
250039313001001	250039314001069	250039322002061	250039322002135
250039313001002	250039314001070	250039322002062	250039322002147
250039313001004	250039314001071	250039322002063	250039322002148
250039313001005	250039314001072	250039322002064	250039322002149
250039313001014	250039314001080	250039322002066	250039322002155
250039313001017	250039322001046	250039322002067	250039322002171
250039313001018	250039322001052	250039322002071	250039322002172
250039313001019	250039322001053	250039322002072	250039322002173
250039313001026	250039322001056	250039322002073	250039322002174
250039313001051	250039322001068	250039322002074	250039322002175
250039313001069	250039322001069	250039322002075	250039322002176
250039313001096	250039322001070	250039322002076	250039322002177
250039313001102	250039322001072	250039322002077	250039322002178
250039313001103	250039322001075	250039322002078	250039322002179
250039313002032	250039322001079	250039322002079	250039322002182
250039313002038	250039322001080	250039322002080	250039322002191
250039313002049	250039322001081	250039322002082	250039322002192
250039313002058	250039322001087	250039322002083	250039322002215
250039313002060	250039322001089	250039322002084	250039322002219
250039313002063	250039322001092	250039322002087	250039322002222
250039313002066	250039322002002	250039322002090	250039322002227
250039313002067	250039322002004	250039322002092	250039322003004
250039313002068	250039322002008	250039322002093	250039322003009
250039313002072	250039322002021	250039322002095	250039322003013
250039313002074	250039322002024	250039322002096	250039322003017
250039313002080	250039322002025	250039322002098	250039322003026
250039313002083	250039322002031	250039322002099	250039322003027
250039313002084	250039322002033	250039322002100	250039322003029
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250039332001011	250039332002044	250039332002132	250039334002067
250039332001015	250039332002045	250039332002133	250039334002068
250039332001016	250039332002047	250039332002137	250039334002070
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250039332001034	250039332002059	250039334001061	250039334002083
250039332001035	250039332002060	250039334001066	250039334002084
250039332001036	250039332002061	250039334001068	250039334002087
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250039332001040	250039332002067	250039334001078	250039334002101
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250039332001046	250039332002074	250039334001083	250039334002117
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250039332001052	250039332002079	250039334001105	250039334003001
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250039334003066	250039343002010	250039343002121	250110401001099
250039334003068	250039343002015	250039343002122	250110401001100
250039334003069	250039343002016	250039343002125	250110401001108
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250039334003085	250039343002046	250039351001035	250110401001136
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