BEFORE THE GEORGIA
PUBLIC SERVICE COMMISSION

In the Matter of	)	
Application of Planters Communications, LLC	)	
for Designation as an Eligible Telecommunications	)	Docket No. _____
Carrier to Receive Rural Digital Opportunity Fund	)	
Phase I Auction (Auction 904) Support for Voice	)	
And Broadband Services	)	

APPLICATION OF PLANTERS COMMUNICATIONS, LLC
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
REQUEST FOR EXPEDITED CONSIDERATION

Planters Communications, LLC ("Planters"), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"),[1] Sections 54.201 and 54.202of the rules and regulations of the Federal Communications Commission ("FCC"),[2] and in accordance with Georgia Public Service Commission's ("Commission") requirements as set forth in Georgia Admin Code 515-12-1-.35, respectfully requests designation as a High-Cost and Low Income Eligible Telecommunications Carrier ("ETC") for a service area comprising the census blocks in the State of Georgia listed on **Exhibit A** hereto (475 locations) (the "Assigned Census Blocks").[3] Planters seeks this designation in order to assume the Rural Digital Opportunity Fund ("RDOF") obligations of Windstream Communications, LLC and its affiliate Windstream Georgia Communications, LLC (collectively, "Windstream") for the Assigned Census Blocks pursuant to a Joint Application for Consent to Partial Assignment of Domestic Section 214 Authorization now pending before the FCC (the "Section 214 Application").[4] Planters requests that the designation be

[1] 47 U.S.C. § 214(e)(2).
[2] 47 C.F.R §§ 54.201 and 54.202.
[3] The Assigned Census Blocks are listed in Exhibit A hereto.
[4] Joint Application for Consent to Partial Assignment of Domestic Section 214 Authorization, WC Docket No. 26-169 (filed August 2026).

granted effective upon, and conditioned upon, consummation of the assignment approved in the Section 214 Application. Planters understands that Windstream will relinquish its ETC designation for the Assigned Census Blocks upon the Commission's approval of this Application and consummation of the assignment.

Planters will offer broadband and voice services throughout the RDOF Phase I eligible census blocks identified in Exhibit A and seeks ETC designation to participate in both the High-Cost and Low-Income programs of the federal Universal Service Fund in order to serve these census blocks.

Section 214(e)(2) of the Act authorizes the Commission to designate a common carrier that meets the requirements of Section 214(e)(1) as an ETC. As demonstrated in this Application, Planters meets all applicable federal and state requirements for ETC designation, and, as shown by the description herein of Planters' planned voice and broadband deployment, designating Planters as an ETC in the Assigned Census Blocks would advance the goals of universal service and is in the public interest. Because the timeframe for Planters to obtain ETC designation is tied to the pending Section 214 Application, Planters respectfully requests that the Commission review this Application promptly and grant it on an expedited basis.

I. BACKGROUND

Planters is a Georgia limited liability company with its principal office at 100 Ogeechee Street, Newington, Georgia 30455. Planters is a Competitive Local Exchange Carrier that has provided voice and broadband services in Georgia since 2006 under Georgia Certificate No. L-0415. Planters is a wholly owned subsidiary of Planters Rural Telephone Cooperative, Inc. ("PRTC") and shares PRTC's management team.

PRTC is a rural telephone cooperative established in 1950 and headquartered in Newington, Georgia. Together, Planters and PRTC manage nearly 3,000 miles of fiber optic cable, serve more than 10,000 customers, and provide broadband service at speeds up to 8 Gbps. In addition to serving residential, commercial, and enterprise customers, along with schools, hospitals, and emergency services, Planters acts as an underlying carrier providing wholesale transit IP service to other Internet service providers. Planters currently provides limited service within Jenkins County, including at the edges of the area comprising the Assigned Census Blocks. Planters and PRTC together have the personnel, network, and operational experience necessary to deploy and operate fiber-based voice and broadband service throughout the Assigned Census Blocks.

II. COMMUNICATIONS AND CORRESPONDENCE

Pleadings, orders, notices, or other correspondence and communications regarding this Application should be provided to:

Stephen Milner
Chief Executive Officer
Planters Communications, LLC
100 Ogeechee St.
Newington, GA 30455
(912) 857-4411
Stephen.milner@pbc.net

with a copy to:

John Kuykendall
JSI, LLC
6404 Ivy Lane, Suite 700
Greenbelt, Maryland 20770
(301) 459-7590
john.kuykendall@jsitel.com
Regulatory Advisor to Planters Communications, LLC

III. WINDSTREAM'S PARTICIPATION IN THE FCC'S RDOF AUCTION

A. Background on the RDOF Auction

On January 30, 2020, the FCC adopted *the Rural Digital Opportunity Fund Report and Order*,[5] establishing the framework for the RDOF, including the use of reverse auctions in two phases. The RDOF was implemented to provide $20.4 billion to connect millions of rural homes and businesses to high-speed broadband networks as part of the FCC's biggest step to close the digital divide.[6] On July 11, 2020, the FCC adopted final procedures for Phase I of the RDOF Auction, which utilized competitive bidding to allocate up to $16 billion over ten years to service providers that commit to offer voice and broadband services to fixed locations in eligible unserved high-cost census blocks.[7]

B. Windstream's Selection as a Winning Bidder

The RDOF Auction began on October 29, 2020, and concluded on November 25, 2020. On December 7, 2020, the FCC announced the results of the competitive bidding.[8] Windstream Georgia Communications, LLC was a winning bidder for locations in Georgia Study Area Code ("SAC") 223037. On January 14, 2022, the Wireline Competition Bureau authorized Windstream Georgia Communications, LLC to receive $14,733,548.40 in RDOF support over the ten-year support term for SAC 223037.[9] Windstream Georgia Communications, LLC delegated its RDOF obligations for the Assigned Census Blocks to its affiliate Windstream Communications, LLC. The portion of the SAC 223037 award attributable to the Assigned Census Blocks, which are

[5] *See generally Rural Digital Opportunity Fund; Connect America Fund*, Order, 35 FCC Rcd 686 (2020) (*Rural Digital Opportunity Fund Order*).
[6] Id.
[7] *Auction 904 Procedures Public Notice*, para. 1.
[8] *Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes,* Public Notice, 35 FCC Rcd 13888 (2020).

[9] *Rural Digital Opportunity Fund Auction Support Authorized for 2,521 Winning Bids,* Public Notice, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, DA 22-38 (rel. Jan. 14, 2022).

located in Jenkins County, Georgia, is $1,676,406. The Georgia Public Service Commission designated Windstream Communications, LLC as an ETC for the Assigned Census Blocks on May 18, 2021.[10]

As a recipient of RDOF support, the supported provider must offer at least one standalone voice plan and one service plan providing broadband at speeds of at least 1 Gbps downstream and 500 Mbps upstream with latency at or below 100 milliseconds. The supported provider must build out to 40 percent of the requisite number of locations in Georgia within three years of authorization, and this benchmark increases by 20 percent at the end of each of the fourth and fifth years of support.[11]

C. Assignment of RDOF Obligations and Support to Planters

On November 5, 2025, Planters and Windstream entered into an Assignment and Assumption Agreement (the "Agreement") under which Windstream agreed to assign to Planters all remaining RDOF support and the RDOF obligations for the Assigned Census Blocks, and Planters agreed to accept that support and assume those obligations, subject to required regulatory approvals. Upon consummation, Planters will receive the remaining RDOF support associated with the Assigned Census Blocks, in the amount of $1,676,406, and will assume the associated deployment, performance, and reporting obligations. Planters will use the RDOF support to construct, operate, and maintain a fiber optic network capable of providing voice service and high-speed broadband Internet access at speeds of at least 1 Gbps downstream and 500 Mbps upstream throughout the Assigned Census Blocks.

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[10] *In re Application of Windstream Communications, LLC for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934 in the State of Georgia,* Order, Georgia Public Service Commission Docket No. 43837 (issued May 18, 2021).

[11] Auction 904 Procedures Public Notice, para. 17.

Planters currently provides limited service within Jenkins County, and there is slight overlap at the edges of the area comprising the Assigned Census Blocks. As set forth in the Section 214 Application, the parties have committed to avoid duplicate recovery of RDOF support for any location where one party receives RDOF support and the other makes qualifying broadband service available. Because Planters' existing operations are proximate to the Assigned Census Blocks, Planters can achieve economies of scale and leverage its workforce, infrastructure, and operational capabilities to build out the Assigned Census Blocks rapidly and cost-effectively as it expands its broadband operations.

D. Need for Expedited ETC Designation

Under the terms of the Section 214 Application, Planters' authorization to receive RDOF support for the Assigned Census Blocks is conditioned upon Planters obtaining ETC designation from this Commission, together with a letter of credit and a bankruptcy opinion letter, within 90 days of the release of the FCC order granting the assignment. Because the time available to obtain ETC designation following that order is short, and the consequences of failing to obtain it are severe, Planters respectfully requests that the Commission review this Application promptly and grant it on an expedited basis, with the designation effective upon consummation of the assignment.

IV. PLANTERS AND ITS TECHNICAL QUALIFICATIONS

A. Planters Expertise and Experience

Planters is qualified to meet the applicable RDOF obligations. Its parent, PRTC, has successfully participated in government-funded infrastructure builds and has a proven record of technical and commercial success providing voice and broadband services. Planters and PRTC together have extensive experience providing voice and broadband services in rural Southeast

Georgia and have established relationships with contractors and officials in the region. Planters has experience managing the technical and customer-service functions associated with voice and broadband service and will apply the same level of service and network monitoring to customers in the Assigned Census Blocks. Planters will offer high-speed broadband services and voice services throughout the Assigned Census Blocks.

B. Planters' Services and Network Architecture

Planters will leverage its fiber-to-the-home network to provide broadband and voice services to customers throughout the Assigned Census Blocks, an area that has largely lacked access to such services. Planters plans to offer standalone broadband Internet service, with no data caps, at bidirectional speeds and prices including 1000/1000 Mbps at $124.95 per month.

Planters will provide voice-grade access to the public switched telephone network through interconnected VoIP service furnished over its own facilities, at $33.60 per month per user for standalone voice service, and in bundles with broadband service. Planters' voice service will include caller ID, call waiting, E911, call return, robocall blocking, a personalized user portal, call forwarding, caller ID blocking, three-way calling, and voicemail.

Accordingly, the grant of this Application is important for consumers in rural Georgia to receive high-speed broadband and high-quality voice services.

V. COMMISSION HAS AUTHORITY TO DESIGNATE PLANTERS AS AN ETC

The Commission has the authority to designate Planters as an ETC, pursuant to Section 214(e)(2) of the Act, for the proposed service area.[12] Under Section 214(e)(2), a State commission shall, upon its own motion or upon request, designate a common carrier that meets the requirements of Section 214(e)(1) as an ETC for purposes of receiving universal service

[12] 47 U.S.C. §§ 214(e)(1)-(2).

support in a service area designated by the State commission. Sections 54.201(c) and (d) of the FCC's rules reflect Section 214(e) of the Act and provide that, upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC for a service area designated by the State commission, so long as each additional requesting carrier meets the applicable requirements.[13] The Commission therefore has jurisdiction over Planters' designation request and the authority to designate Planters as an ETC for purposes of receiving universal service support in the Assigned Census Blocks.

VI. PLANTERS MEETS THE FEDERAL AND STATE STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION

Planters meets all applicable federal and state requirements for designation as an ETC in Georgia. As shown below, Planters meets the requirements outlined in Section 214(e)(1) of the Act[14] and Section 54.201(d) of the FCC's rules,[15] as well as the additional requirements for ETC designation under Section 54.202 of the FCC's rules.[16] Additionally, Planters meets the requirements outlined in Georgia Admin Code 515-12-1-.35.

A. Planters Meets All Federal Requirements For ETC Designation

Planters meets all criteria for designation as an ETC under federal law. Specifically:

(1) Planters will provide the supported services on a common carrier basis through its provision of interconnected VoIP service. (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)).

[13] 47 C.F.R. §§ 54.201(c)-(d).

[14] 47 U.S.C. §§ 214(e)(1).
[15] 47 C.F.R. §§ 54.201(d).
[16] 47 C.F.R. §§ 54.201(c).

(2) Planters will offer voice and broadband services over facilities that it owns. Planters will provide voice-grade service and broadband service using its own loop facilities. Accordingly, Planters will offer the supported services using its own facilities. (47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)).

(3) As required by Section 54.101 of the FCC's rules,[17] Planters will offer the voice telephony and broadband services supported by the federal universal service support mechanisms, including the following:

Voice Grade Access to the Public Switched Telephone Network. Planters will provide voice service that includes local usage at no additional charge to end users and access to emergency services through 911 or E911 where available. Local usage means an amount of minutes of use of exchange services, prescribed by the FCC, provided free of charge to end users.[18] The FCC has not specified a minimum amount of local usage that an ETC must offer. Planters will meet the local usage requirement by including local usage in its rate plans and will comply with any minimum local usage requirement adopted by the FCC or the Commission. There is no requirement to provide toll limitation service if the Lifeline offering provides a set number of minutes that do not distinguish between toll and non-toll calls. Planters' voice offering does not distinguish between toll and non-toll calls. Accordingly, Planters is not required to provide toll limitation service and has no present plans to offer it. (47 C.F.R. § 54.101(a)(1)).

Broadband Internet Access Service. Planters' broadband Internet access service will provide the capability to transmit data to and receive data from all Internet endpoints, excluding dial-up service. Planters' provision of high-speed broadband Internet access over its fiber

[17]47 C.F.R. § 54.101.

[18]47 C.F.R. § 54.101(a)(2).

facilities satisfies the FCC's definition of broadband Internet access service, and Planters will therefore provide all services designated for support by the FCC. (47 C.F.R. § 54.101(a)(2)).

Planters commits to provide these services consistent with the applicable high-cost universal service support rules (47 C.F.R. § 54.101(c)), and will offer Lifeline service as required by the FCC's rules within the Assigned Census Blocks (47 C.F.R. § 54.101(d); 47 C.F.R. § 54.400 et seq.).

(4) Planters will offer voice telephony as a standalone service, and will offer voice telephony and broadband service at rates that are reasonably comparable to urban rates.[19]

(5) Planters will advertise the availability of its universal service offerings and the charges for those offerings using media of general distribution, including a combination of digital and traditional media, and will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify. (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2); 47 C.F.R. § 54.405(b)).

(6) Planters will provide the supported services throughout the designated service area identified in Exhibit A. (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)).

(7) Planters certifies that, in accordance with 47 U.S.C. § 254(e), it will use federal universal service support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended.

(8) Planters possesses the financial and technical capability to provide the supported services. Planters does not, and will not, rely on universal service support to operate, and is able to obtain additional financing if necessary in addition to the RDOF support being made available to it. Planters has not been subject to any enforcement or ETC revocation proceeding and has

[19] *USF/ICC Transformation Order,* 26 FCC Rcd 17663, 17693, paras. 80-81 (2011); see also 47 C.F.R. § 54.101(b).

substantial experience maintaining and upgrading network infrastructure. (47 C.F.R. § 54.202(a)(4)).

(9) Planters further certifies that it meets the additional requirements for ETC designation under 47 C.F.R. § 54.202:

Compliance with Applicable Service and Performance Quality Requirements. Planters certifies that it will comply with the service requirements applicable to the support it receives, including the requirements of the RDOF Auction.[20] Planters also certifies that it will comply with the ETC-specific commitments required by the FCC in its *2005 ETC Order.*[21] The FCC has waived the requirement for an RDOF winning bidder to file a five-year plan as part of the ETC designation process and to demonstrate that it will satisfy applicable consumer protection and service quality standards. Planters is subject to and complies with all state and federal consumer protection requirements and service quality standards applicable to its operations, has not been the subject of any material consumer complaint or investigation, and will comply with all applicable consumer protection and service quality standards.

Ability to Remain Functional in Emergency Situations. Planters certifies that its network will remain functional in emergency situations as required by Section 54.202(a)(2) of the FCC's rules.[22] Planters will maintain reasonable provisions for emergencies, including a reasonable amount of backup power to ensure functionality without an external power source, the ability to

[20]Auction 904 Procedures Public Notice, para. 136; *WCB Reminds Connect America Fund Phase II Applicants of the Process for Obtaining Federal Designation as an Eligible Telecommunications Carrier,* Public Notice, 33 FCC Rcd 6696 (WCB 2018) (waiving the requirement for a winning bidder to file a five-year plan under 47 C.F.R. § 54.202(a)(1)(ii) and to demonstrate satisfaction of applicable consumer protection and service quality standards under 47 C.F.R. § 54.202(a)(3)).

[21]*Federal-State Joint Board on Universal Service,* CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

[22]47 C.F.R. § 54.202(a)(2).

reroute traffic around damaged facilities, and the capability to manage traffic spikes resulting from emergency situations. Planters' central office facilities will be equipped with standby generators and battery backup sufficient to maintain both voice and broadband network equipment during power outages, and Planters will maintain redundant routing and electronics for both voice and broadband service.

B. Planters Meets All State Requirements For ETC Designation

As explained below, Planters meets all the requirements of Georgia Admin Code 515-12-1-.35 for designation as an ETC as follows:

(1) Planters will satisfactorily resolve within a reasonable time any complaint filed against it with the Commission's Consumer Affairs Unit. (515-12-1-.35(2)).

(2) Planters will advertise the availability of Lifeline service on its Internet website. (515-12-1-.35(3)).

(3) Planters will not charge usage or fees of any kind for calls to customer service. Planters' voice service will include local and interstate calling, and no fees will be charged for calls to customer service. (515-12-1-.35(4)).

(4) Planters will file the number of Lifeline subscribers that it serves in Georgia as of June 30 and December 31 of each year, broken down by eligibility criterion, within 15 days from the close of each period. (515-12-1-.35(5)).

(5) Planters does not provide no-cost service after application of the Lifeline discount. To the extent it provides such service in the future, Planters will file the quarterly reports required by the rule, due no later than 15 days from the close of each quarter, reporting the number of customers deactivated pursuant to 47 C.F.R. § 54.405(e)(3), the number who did not pass annual verification, and the number voluntarily deactivated. (515-12-1-.35(6)).

(6) Planters will include in its Lifeline materials, including advertisements, application forms, and verification forms, the following language: "Unresolved complaints concerning Lifeline service can be directed to the Georgia Public Service Commission's Consumer Affairs Unit at (404) 656-4501 or (800) 282-5813." Planters certifies that its Georgia Lifeline application and eligibility verification forms will comply with the Commission's rules. (515-12-1-.35(7)).

(7) Planters will provide 30 days written notice to the Commission of any proposed increase in its lowest cost service rate available to Lifeline customers, any increase in connection charges, or the addition of any surcharge, other than those specifically provided for in State or Federal law.

(8) Planters will include its lowest cost service offering in all Lifeline advertisements.

VII. DESIGNATION OF PLANTERS AS AN ETC IS IN THE PUBLIC INTEREST

Designation of Planters as an ETC serves the public interest by enabling Planters to bring high-speed broadband Internet access and voice services to underserved locations in the Assigned Census Blocks, including to low-income households that qualify for Lifeline discounts. The grant of this Application will enable Planters to provide low-latency, gigabit-capable broadband and interconnected VoIP voice services to residents and businesses in the Assigned Census Blocks and to provide subsidized voice and broadband services to households that qualify for federal Lifeline benefits. Planters' participation will encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans, and will aid the FCC's objective of ensuring that federal universal service support, including RDOF support, is used efficiently and effectively.

Planters has the requisite technical, managerial, and financial fitness to meet its ETC and RDOF obligations. The Planters companies have held Georgia ETC status for nearly three decades; the Commission designated the Planters incumbent local exchange company as an ETC

within its service area in 1997. Because Planters' existing Georgia operations are proximate to the Assigned Census Blocks, Planters can achieve economies of scale and leverage its workforce, infrastructure, and operational capabilities to build out the Assigned Census Blocks rapidly and cost-effectively.

The RDOF support was awarded through a competitive bidding process designed to allocate funding to providers that could efficiently and cost-effectively deliver the required services to unserved areas. Any Lifeline support that Planters receives will have a de minimis impact on the fund, which the FCC has determined is outweighed by the benefit of increased Lifeline participation. Planters will contribute to the Universal Service Fund based on the portion of its revenues determined to be interstate. Designating Planters as an ETC will expand voice and broadband connectivity in rural Georgia, help close the digital divide, and promote economic and job growth. Because granting this Application will allow Planters to use the RDOF support as intended to expand voice and broadband service in Georgia, designating Planters as an ETC is in the public interest.

VIII. ANTI-DRUG ABUSE CERTIFICATION

Planters certifies that neither the petitioner nor any party to this Application is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.[23]

IX. CONCLUSION

For the reasons stated herein, Planters respectfully requests that the Commission (i) designate Planters as a High-Cost and Low-Income ETC for the Assigned Census Blocks listed in Exhibit A, effective upon and conditioned upon consummation of the assignment approved in

[23] 21 U.S.C. § 862, as implemented in Section 1.2002 of the FCC's rules (47 CFR § 1.2002).

the Section 214 Application, so that Planters will be eligible to receive RDOF Phase I support and to provide Lifeline benefits to qualifying households in the Assigned Census Blocks; (ii) act on this Application on an expedited basis; and (iii) grant such other relief as the Commission deems just and proper.

Respectfully submitted,

September 29, 2026

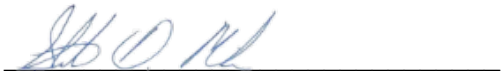


Stephen Milner
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912-687-3633
Stephen.milner@pbc.net

VERIFICATION

I, Stephen Milner, Chief Executive Officer of Planters Communications, LLC ("Planters"), am authorized to make this Verification on behalf of Planters; that the foregoing Application was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of September, 2026.



Stephen Milner
Chief Executive Officer
Planters Communications, LLC

EXHIBIT A
Assigned Census Block Group
Jenkins County

Block Group ID(s):
131659601001

Census Block ID(s):

131659601001000
131659601001003
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