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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Petition of Commnet Four Corners, LLC for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving CAF Phase II Support	Docket No. 18-2609-01
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**PREFILED DIRECT TESTIMONY OF ROHAN RANARAJA**

Commnet Four Corners, LLC hereby submits the Prefiled Direct Testimony of Rohan Ranaraja in this docket.

DATED this 10th day of October 2018.

HATCH, JAMES & DODGE



/s/

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Phillip J. Russell  
*Attorneys for Commnet Four Corners, LLC*

Certificate of Service  
Docket No. 18-2609-01

I hereby certify that a true and correct copy of the foregoing Prefiled Direct Testimony of Rohan Ranaraja was served by email this 10th day of October 2018 on the following:

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/s/ Phillip J. Russell

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Petition of Commnet Four Corners, LLC for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving CAF Phase II Support	Docket No. 18-2609-01
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**Direct Testimony of Rohan Ranaraja**

**On Behalf of**

**Commnet Four Corners, LLC**

**October 10, 2018**

1 **INTRODUCTION AND SUMMARY**

2 **Q. PLEASE STATE YOUR NAME, PLACE OF EMPLOYMENT AND BUSINESS**  
3 **ADDRESS.**

4 A. My name is Rohan Ranaraja. I am employed by Commnet Wireless, LLC, the  
5 parent company of the Applicant Commnet Four Corners, LLC, as Director of Regulatory  
6 Compliance. My business address is 1001 Technology Drive, Little Rock, Arkansas  
7 72223.

8 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.**

9 A. I have a Bachelor's degree from Ohio Wesleyan University and a Master's degree  
10 from Baylor University.

11 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EXPERIENCE AND**  
12 **BACKGROUND.**

13 A. In my professional capacity, I have worked on regulatory matters before the  
14 Federal Communications Commission ("FCC") and numerous state regulatory agencies  
15 over the past 20 years. I have worked on universal service matters for more than 15 years.

16 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

17 A. No. This is the first time I have provided testimony before this Commission.

18 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE UTILITY REGULATORY**  
19 **COMMISSIONS IN OTHER STATES?**

20 A. Yes. During my career I have testified in person or filed testimony relating to  
21 universal service and regulatory matters before a number of state regulatory agencies,

22 including Arkansas, Arizona, Oklahoma, Kansas, Nebraska, South Carolina, Georgia,  
23 Montana and Idaho.

24 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

25 A. The purpose of my testimony is to discuss the qualifications of the Applicant,  
26 Commnet Four Corners, LLC (“Commnet Four Corners”), to be designated as an Eligible  
27 Telecommunications Carrier (“ETC”) for the purpose of receiving high cost universal  
28 service support from the Connect America Fund Phase II.

29 **Q. PLEASE DESCRIBE COMMNET FOUR CORNERS.**

30 A. Commnet Four Corners is a wholly-owned subsidiary of Commnet Wireless, LLC  
31 (“Commnet Wireless”). Commnet Four Corners currently operates as an ETC in the  
32 states of Colorado, New Mexico, and Montana.

33 **Q. PLEASE DESCRIBE COMMNET WIRELESS.**

34 A. Commnet Wireless is a wholly-owned subsidiary of ATN International, Inc., a  
35 publicly traded corporation headquartered in Beverly, Massachusetts, and licensed by the  
36 FCC as a facilities based provider of Commercial Mobile Radio Services (“CMRS”) and  
37 provides those services in principally rural areas. Commnet Wireless focuses principally  
38 on areas with a population of 2500 or less. Its coverage footprint includes several states  
39 in the southwestern United States and several Native American reservations and in some  
40 cases is the only wireless communications provider in those areas. Commnet Wireless  
41 operates facilities based networks in 14 states. Commnet Wireless provides mobile voice  
42 and broadband services as well as fixed broadband services over those facilities on both a  
43 wholesale and retail basis.

44 **Q. HAS COMMNET WIRELESS BEEN DESIGNATED AN ETC IN ANY OTHER**  
45 **STATE FOR PURPOSES OF RECEIVING HIGH COST UNIVERSAL SERVICE**  
46 **SUPPORT?**

47 A. Yes. Commnet Wireless and/or its wholly-owned subsidiaries are presently  
48 designated as an ETC, for purposes of receiving high cost universal service funds, and  
49 operates as an ETC in certain areas of Colorado, Montana, New Mexico and Nevada in  
50 that capacity.

51 **Q. IS COMMNET WIRELESS SEEKING ETC DESIGNATION IN ANY OTHER**  
52 **STATE FOR PURPOSES OF RECEIVING CAF PHASE II SUPPORT?**

53 A. As the Winning Bidder in the Connect America Fund (“CAF”) Phase II Auction  
54 in six (6) states, Commnet Wireless and/or its wholly-owned subsidiaries have filed  
55 similar requests seeking ETC designations in the states of Arizona, Colorado, Nevada,  
56 New Mexico and Wyoming. Commnet Wireless has also filed a similar Application  
57 before the Federal Communications Commission on behalf of its affiliate NTUA  
58 Wireless, LLC.

59 **Q. WHY IS COMMNET FOUR CORNERS, SEEKING TO BE DESIGNATED AN**  
60 **ETC IN UTAH?**

61 A. Commnet Wireless was the Winning Bidder in the CAF Phase II Auction 903,  
62 making it eligible to receive support to provide wireless services in the areas identified in  
63 Exhibit 1 of the Petition filed in this docket. Consistent with FCC rules, Commnet  
64 Wireless assigned its winning bids in the state of Utah to Commnet Four Corners and its  
65 affiliate, NTUA Wireless, LLC. NTUA Wireless, LLC has been assigned the winning

66 census block groups within the boundaries of the Navajo Nation in the state of Utah.  
67 Commnet Four Corners has been assigned the winning census block groups outside the  
68 boundaries of the Navajo Nation in the State of Utah.

69 Commnet Four Corners is required to obtain a high cost ETC designation to  
70 become eligible to receive funding from the federal universal service fund. Pursuant to  
71 requirements of the FCC, Commnet Four Corners must submit to the FCC documentation  
72 showing that it has obtained a high-cost ETC designation by February 25, 2019.

73 **Q. DOES THE UTAH PUBLIC SERVICE COMMISSION HAVE THE AUTHORITY**  
74 **TO DESIGNATE COMMNET FOUR CORNERS AS AN ETC?**

75 A. Yes. Pursuant to 47 U.S.C. § 214(e)(2), state utility regulatory commissions have  
76 authority to designate a qualified carrier as an ETC. Specifically, Section 214(e)(2)  
77 authorizes a State commission to “designate a common carrier that meets the  
78 requirements” of an ETC “for a service area designated by the State Commission.” This  
79 Commission has previously exercised its authority to designate qualified carriers as ETCs  
80 as described in the Application.

81 **Q. PLEASE IDENTIFY THE REQUIREMENTS FOR ETC DESIGNATION.**

82 A. FCC rule 47 C.F.R. § 54.201(d) defines eligibility for the CAF Phase II Fund  
83 support. To receive such support, 47 C.F.R. § 54.201(d) requires that a “common carrier”  
84 must 1) “[o]ffer the services that are supported by federal universal service support  
85 mechanisms,” and 2) “[a]dvertise the availability of such services and the charges  
86 therefore using media of general distribution.

87 **Q. DOES COMMNET FOUR CORNERS MEET ALL OF THE REQUIREMENTS**  
88 **TO BE DESIGNATED AS AN ETC?**

89 A. Yes.

90 **Q. IS COMMNET FOUR CORNERS A “COMMON CARRIER”?**

91 A. Yes. “Common Carrier” is defined in 47 U.S.C. § 153(11) as “any person  
92 engaged as a common carrier for hire, in interstate or foreign communication by wire or  
93 radio or interstate or foreign radio transmission of energy.” Commnet Four Corners is  
94 regulated as a common carrier in connection with its provision of Commercial Mobile  
95 Radio Service (“CMRS”), as that term is defined in 47 C.F.R. § 20.3. Therefore,  
96 Commnet Four Corners certifies that it is a common carrier under 47 U.S.C. § 214(e)(1)  
97 for purposes of ETC designation.

98 **Q. DOES COMMNET FOUR CORNERS OFFER THE SUPPORTED SERVICES**  
99 **SET FORTH IN 47 C.F.R. § 54.101(a) EITHER BY USING ITS OWN**  
100 **FACILITIES OR A COMBINATION OF ITS OWN FACILITIES AND THE**  
101 **RESALE OF ANOTHER CARRIER’S SERVICES?**

102 A. Yes. 47 C.F.R. § 54.101(a) identifies the services that are supported by federal  
103 universal service support mechanisms, stating that such services are “voice telephony  
104 services” and “broadband service.” 47 C.F.R. § 54.101(a)(1) identifies the characteristics  
105 of “voice telephony services” that a common carrier must provide. 47 C.F.R. §  
106 54.101(a)(2) identifies the characteristics of “broadband service” that a common carrier  
107 must provide.

108 Specifically, 47 C.F.R. § 101(a) states as follows:

109 (a) *Services designated for support.* Voice telephony services and  
110 broadband service shall be supported by federal universal service  
111 support mechanisms.

112 (1) Eligible voice telephony services must provide voice grade  
113 access to the public switched network or its functional equivalent;  
114 minutes of use for local service provided at no additional charge to end  
115 users; access to the emergency services provided by local government  
116 or other public safety organizations, such as 911 and enhanced 911, to  
117 the extent the local government in an eligible carrier's service area has  
118 implemented 911 or enhanced 911 systems; and toll limitation services  
119 to qualifying low-income consumers as provided in subpart E of this  
120 part.

121 (2) Eligible broadband Internet access services must provide the  
122 capability to transmit data to and receive data by wire or radio from all  
123 or substantially all Internet endpoints, including any capabilities that  
124 are incidental to and enable the operation of the communications  
125 service, but excluding dial-up service.

126 As described in further detail below, Commnet Four Corners will offer all of these  
127 services, using its own facilities in the Census Block Groups in which Commnet Wireless  
128 was the Winning Bidder in Auction 903. Commnet Four Corners is a facilities-based  
129 mobile voice/broadband and fixed broadband provider with its own towers, radio  
130 equipment, trunking, switching facilities, and other associated facilities. Therefore,  
131 Commnet Four Corners meets the applicable facilities-based requirement for ETCs that  
132 the supported services must be provided either using its own facilities or a combination of  
133 its own facilities and resale of another carrier's service.

134 **Q. PLEASE DESCRIBE HOW COMMNET FOUR CORNERS WILL PROVIDE**  
135 **THE SUPPORTED SERVICES?**

136 A. Commnet Four Corners offers the services supported by the universal service  
137 support mechanisms, as set forth in 47 C.F.R. § 54.101(a)(1) and (2).

138 Eligible Voice Telephony Services

139 Commnet Four Corners will meet this requirement through its provision of mobile  
140 voice service that is interconnected to the public switched telephone network. Commnet  
141 Four Corners' voice service includes minutes of use for local service provided at no  
142 charge to end users. Commnet Four Corners' voice service also provides access to  
143 emergency services via 911 or E-911, wherever available from local government or  
144 public safety organizations. Commnet Four Corners commits to provide toll limitation  
145 services to qualifying low-income consumers as provided in the FCC's Rules. As the  
146 operating ETC, Commnet Four Corners already satisfies this requirement in the states of  
147 Colorado, New Mexico and Montana.

148 Broadband Internet Access Services

149 Commnet Four Corners' broadband internet offering provides the capability to  
150 transmit and receive data by radio from all or substantially all internet endpoints,  
151 including any capabilities that are incidental to and enable the operation of the  
152 communications service. As the operating ETC, Commnet Four Corners already satisfies  
153 this requirement in the states of Colorado, New Mexico and Montana.

154 For CAF Phase II support recipients, the FCC defines supported service as  
155 qualifying voice service and conditions the grant of funding on the offering of qualifying

156 broadband services. Therefore, an ETC must offer voice telephony as a standalone  
157 service throughout the designated service area and must offer voice telephony services at  
158 rates that are reasonably comparable to urban rates. Commnet Four Corners commits to  
159 provide the supported services consistent with the obligations applicable to CAF Phase II  
160 support recipients. Commnet Four Corners also commits to offer Lifeline service as  
161 required by the FCC's rules at all locations where it has been awarded support. As the  
162 operating ETC in the states of Colorado, New Mexico and Montana, Commnet Four  
163 Corners is familiar with and already complies with the requirement relating to Lifeline  
164 service.

165 **Q. ARE THERE ADDITIONAL ELIGIBILITY CRITERIA THAT AN APPLICANT**  
166 **MUST SATISFY TO BE DESIGNATED AN ETC?**

167 A. Yes. Commnet Four Corners certifies that it satisfies the additional requirements  
168 for designation as an ETC under Section 47 C.F.R. § 54.202.

169 **Q. PLEASE DESCRIBE HOW COMMNET FOUR CORNERS WILL SATISFY**  
170 **EACH OF THE ADDITIONAL ELIGIBILITY CRITERIA.**

171 A. Five-Year Plan

172 Commnet Four Corners certifies that it will provide service to the locations for  
173 which it has been awarded support consistent with the deployment obligations associated  
174 with the receipt of CAF Phase II support including the annual reporting of service to  
175 geocoded locations and certification of benchmark milestones. Given these obligations,  
176 the FCC has waived the requirement that winning bidders seeking an FCC ETC  
177 designation file a five-year service improvement plan. Accordingly, Commnet Four

178 Corners requests the Commission similarly waive the requirement for a five-year plan in  
179 light of the deployment obligations associated with the receipt of CAF Phase II support.

180 Compliance With Applicable Service Requirements

181 Commnet Four Corners certifies that it will comply with the service requirements  
182 applicable to CAF Phase II support that it receives. The FCC requires all recipients of  
183 CAF Phase II support to provide services that meet the requisite performance  
184 requirements, to at least 95% of the required locations in the designated area at the end of  
185 6 years. Additionally, Commnet Four Corners is required to show progress towards that  
186 requirement by providing data to verify that it is capable of providing service to 60% of  
187 the eligible locations identified by the FCC at the end of 4 years and 80% of the eligible  
188 locations identified by the FCC at the end of 5 years.

189 Ability to Remain Functional in Emergency Situations

190 Commnet Four Corners has the ability to remain functional in emergency  
191 situations as required by FCC rules. Specifically, Commnet Four Corners has adequate  
192 amounts of back-up power to ensure functionality without an external power source, and  
193 is able to reroute traffic around damaged facilities and is capable of managing traffic  
194 spikes resulting from emergency situations. Commnet Four Corners further commits to  
195 comply with any applicable reporting requirements of the FCC with respect to outages.  
196 Commnet Four Corners' system is reinforced by the presence of generator backups,  
197 capable of running for extended periods in the event of a major electrical outage. These  
198 include back-up batteries that provide at least four hours of back-up power and portable  
199 generators can be moved to individual cell sites, as needed. Because individual cell sites

200 are spread out, it is highly unlikely that an electrical outage would affect more than two  
201 sites simultaneously. In the event of power or other types of failure, the cell sites are  
202 equipped with alarms that will alert Commnet Four Corners technicians. Additionally,  
203 the sites are monitored remotely by Commnet Four Corners' 24/7 Network Operations  
204 Center (NOC) should there be a total communications failure at the site. Commnet Four  
205 Corners' main switch connectivity to the public switched voice network is based on a  
206 ring topology and is redundant – if the ring is cut, call traffic can be re-routed. Commnet  
207 Four Corners uses both microwave and leased lines for added diversity to cell site hubs.  
208 Backbone traffic lines are designed with sufficient capacity to manage extraordinary  
209 spikes. The Company has multiple agreements with long distance providers to absorb  
210 excess calling, if needed. Commnet Four Corners has cell sites on wheels, mobile  
211 towers, and mobile generators available for deployment to areas where there are traffic  
212 spikes, due to emergencies or special events. Again, as the operating ETC, Commnet  
213 Four Corners already satisfies this requirement in the states of Colorado, New Mexico  
214 and Montana.

215 *Consumer Protection and Service Quality Standards*

216 Commnet Four Corners certifies that it will satisfy all applicable consumer  
217 protection and service quality standards applicable to CAF Phase II support recipients. It  
218 is worth noting the FCC has waived the consumer protection certification after  
219 determining that it was not essential to its ability to monitor CAF Phase II ETCs' use of  
220 support for its intended purposes.

221 **Q. WILL COMMNET FOUR CORNERS PROVIDE LIFELINE SERVICE?**

222 A. Yes. Upon designation, Commnet Four Corners will offer Lifeline service to  
223 eligible residents in the Census Block Groups where it is the winning bidder in Auction  
224 903. Additionally, Commnet Four Corners commits to comply with all applicable  
225 requirements adopted by the FCC to limit fraud, waste and abuse in the low-income  
226 program. As the operating ETC in the states of Colorado, New Mexico and Montana,  
227 Commnet Four Corners is familiar with and already complies with the requirement  
228 relating to Lifeline service.

229 **Q. WILL COMMNET FOUR CORNERS ADVERTISE THE AVAILABILITY OF**  
230 **ITS SERVICE AND CHARGES?**

231 A. Yes. Commnet Four Corners will advertise the availability of, and charges for,  
232 the supported service offerings using media of general distribution. Commnet Four  
233 Corners will also undertake outreach initiatives to increase consumer awareness of its  
234 Lifeline service offering, consistent with all applicable requirements.

235 **Q. PLEASE IDENTIFY THE AREAS IN WHICH COMMNET FOUR CORNERS**  
236 **SEEKS TO BE DESIGNATED AS ETC.**

237 A. Commnet Four Corners seeks designation as an ETC in portions of eastern Beaver  
238 County and western Kane County. The specific areas are identified in Exhibits 1 and 2 of  
239 Commnet Four Corners' ETC Application in this docket. Exhibit 1 identifies the auction  
240 item numbers and census block group numbers for which Commnet Four Corners has  
241 been awarded CAF Phase II support via Auction 903 in the state of Utah and is seeking  
242 ETC designation in this proceeding.

243 **Q. WILL COMMNET FOUR CORNERS PROVIDE SERVICE THROUGHOUT ITS**  
244 **ETC DESIGNATED AREA?**

245 A. Commnet Four Corners commits to provide the supported service throughout the  
246 ETC requested area. Commnet Four Corners is required to demonstrate and certify its  
247 ability to serve at least 95% of the locations at the end of six (6) years.

248 **Q. WILL GRANT OF THIS APPLICATION SERVE THE PUBLIC INTEREST?**

249 A. A grant of the requested ETC designation for purposes of receiving CAF Phase II  
250 support will serve the public interest. Commnet Four Corners submits that granting this  
251 Application will (1) promote the rapid deployment of advanced services to unserved and  
252 unserved areas in an efficient manner; (2) ensure that CAF Phase II support is used  
253 efficiently and effectively with minimal impact to the size of the fund; and (3) provide  
254 customers in the ETC requested areas a choice of service that is currently not available  
255 and not likely to be available absent the grant of this Application.

256 It is also worth noting that the FCC has found that in the context of CAF Phase II,  
257 bidders demonstrate their ability to efficiently offer services through the competitive  
258 bidding process, while in their short and long form applications, bidders demonstrate their  
259 ability to meet their public interest obligations. Through such a process, the FCC  
260 conducts the cost benefit analysis for ETC designation. Therefore, carriers need not  
261 provide additional specific evidence of service to the public interest in their petitions for  
262 ETC designation.

263 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

264 A. Yes, it does.