

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE VERIFIED)
PETITION OF KIT CARSON ELECTRIC)
COOPERATIVE, INC. AND KIT CARSON)
INTERNET FOR DESIGNATION AS AN) Case No. 20-00126-UT
ELIGIBLE TELECOMMUNICATIONS CARRIER)**

NOTICE AND PROCEDURAL ORDER

THIS MATTER having come before the New Mexico Public Regulation Commission (the “Commission”) upon the Verified Petition of Kit Carson Electric Cooperative, Inc. and Kit Carson Internet (“Kit Carson”) for Designation as an Eligible Telecommunications Carrier for Limited Purposes and Request for Expedited Consideration by the Commission (the “Petition”), the Commission **FINDS** and **CONCLUDES**

1. Kit Carson filed its Petition on June 4, 2020, seeking designation as an Eligible Telecommunications Carriers (“ETC”) to allow Kit Carson to apply and qualify for Commission Broadband Program benefits (17.11.10.31 NMAC), and future benefits from federal programs. Kit Carson requests that the limited ETC designation apply only for specific broadband project areas, if any, for which Kit Carson is awarded Broadband Program grants by the Commission.

2. Kit Carson operates as a competitive local exchange carrier (“CLEC”) pursuant to authority granted by the Commission on February 20, 2001, in Case No. 3406. Kit Carson has not been designated by the Commission as an ETC for its CLEC operations and, therefore, is not currently eligible under the Commission’s SRUSF Rule to apply for project grants under the Broadband Program. 17.11.10.32.A NMAC. However, Kit Carson is aware of areas within its CLEC service territory that are presently unserved or underserved by broadband as defined in the Commission’s SRUSF Rule and it has applied for Broadband Program grants to help fund

construction of facilities that are capable of providing broadband service to customers in those unserved or underserved areas.

3. On April 17, 2020, Kit Carson filed a Broadband Fund Application (“Broadband Application”) in a docket created for 2020 Broadband Program applications, NMPRC Case No. 20-00099-UT. Through its Broadband Application, Kit Carson seeks \$634,688 in Broadband Program Funds to serve approximately 550 low and moderate-income families in its current service area. Kit Carson is investing additional funds to bring the project total investment to \$846,250. The Broadband Application seeks funding to allow Kit Carson to provide VoIP (voice-over-internet protocol) and high-speed broadband service with speeds at or greater than 25/25 Mbps and up to 50/50 Mbps. Kit Carson’s proposed broadband connection will allow families with students (including Taos and Picuris Tribal members), teachers, and first responders access to distance learning, telemedicine, and remote employment. Because of the COVID-19 pandemic, the need for these internet connections is urgent.

4. Kit Carson also seeks federal ETC designation to permit it to participate in future Federal Communications Commission (“FCC”) programs that would provide funding for expansion of its network to serve additional unserved and underserved households in its service territory.

5. Kit Carson’s proposed ETC service area for purposes of the Petition is the specific area or areas for which Kit Carson is awarded Broadband Program grants for the project described in its Broadband Application. After the COVID-19 pandemic hit communities served by Kit Carson, the cooperative was contacted by schools, colleges, and other government organizations to find out how Kit Carson could assist by providing broadband connections for distance learning, remote work, and telemedicine. Kit Carson targeted low and moderate-income

students and their teachers by communicating directly with the following school districts and colleges: Taos Day School; Taos Municipal School; Peñasco Independent Schools; Questa Independent Schools; Cimarron Municipal Schools (also serving Eagle Nest and Angel Fire); Mesa Vista Consolidated Schools; Northern New Mexico College; and UNM-Taos.

6. In future years, Kit Carson’s ETC service area will be defined by the location of any federal or state program grants that are approved by the Commission or FCC. In the event that Kit Carson’s Petition for ETC designation is granted in this case, Kit Carson requests that the docket remain open so Kit Carson can supplement the record on a periodic basis to advise the Commission of state Broadband Program grants, and other federal grants awarded to Kit Carson in future years.

7. On June 10, 2020, the Commission issued an Order Adopting Expedited Procedural Schedule (the “June 10 Order”). The June 10 Order adopted Kit Carson’s proposed expedited procedural schedule and directed Kit Carson to work with the Commission’s Office of General Counsel to draft a procedural notice to the Commission’s Telecommunications Service List. This Notice and Procedural Schedule fulfills the requirements of the June 10 Order.

8. The Commission has jurisdiction over the parties and the subject matter of this case.

9. The procedural schedule adopted by the Commission and related details set forth below should be adopted for this proceeding.

10. At the public hearing, witnesses for the parties shall appear to present live testimony and be subject to examination under oath.

11. The Commission shall hear this matter at a public hearing on July 29, 2020, after the conclusion of the Commission’s open meeting.

IT IS THEREFORE ORDERED:

A. Any party wishing to intervene in this proceeding shall file a motion to intervene on or before July 1, 2020.

B. The Commission's Telecommunications Bureau Staff and intervenors shall file comments on the Petition on or before July 1, 2020.

C. Kit Carson shall file any replies to the Staff and intervenor comments on or before July 15, 2020.

D. The Commission shall conduct a public hearing on July 29, 2020 after the conclusion of the Commission's open meeting in the Commission's Hearing Room on the Fourth Floor of the P.E.R.A. Building, 1120 Paseo de Peralta, Santa Fe, New Mexico.

E. If COVID-19 emergency conditions persist, the Commission may arrange an alternative method for holding the hearing through electronic or telephonic means.

F. All parties wishing to present testimony and evidence shall be prepared to do so at hearing on July 29, 2020.

G. Any witness sponsored by a party shall appear at the public hearing to present oral testimony and be examined under oath. *See* 1.2.2.35.I NMAC.

H. Copies of all exhibits for which admission into evidence is sought shall be distributed to the Commissioners, and counsel for Kit Carson, Staff, and intervenors prior to formally requesting admission.

I. If counsel shows a witness a document during cross-examination, a copy of the document shall be provided to the Commissioners, counsel for Kit Carson, Staff, and intervenors at the time of such cross-examination.

J. Interested persons may appear at the time and place of hearing and make oral or written comment pursuant to 1.2.2.23.F NMAC. Comments shall not be considered as evidence in this case. *See* 1.2.2.23.F NMAC.

K. Pleadings, testimony, written comments, and other documents which shall reference Case No. 20-00126-UT, must be sent by email as follows: prc.records@state.nm.us; and by first-class mail, postage prepaid to: New Mexico Public Regulation Commission, Attention: Melanie Sandoval, Records Management Bureau, P.E.R.A. Building, 1120 Paseo de Peralta, P.O. Box 1269, Santa Fe, NM 87504-1269, Telephone: (505) 827-6968.

L. The filing and service of pleadings and other documents in this case are subject to applicable Commission rules (*see, e.g.*, 1.2.2.10 NMAC), this Order, and rulings in this case.

M. All filings shall be served on the date of filing as specified in the Certificate of Service attached to this Order subject to subsequent amendment of said service list pursuant to 1.2.2.10.C(4) NMAC. Accordingly, unless otherwise requested or ordered, parties shall serve all pleadings, testimony, and other filings by email only by no later than 5:00 p.m. Mountain Prevailing Time (MPT) on the date filed.

N. Except as expressly provided in this Notice and Procedural Order or subsequently ruled, discovery matters, and any discovery disputes shall be governed by the Commission's discovery rules at 1.2.2.25 NMAC. The parties shall raise any disputes, questions, or concerns regarding discovery with the Commission at the earliest available opportunity so that all such issues may be considered well in advance of the hearing.

O. Unless otherwise requested or ordered, service of discovery requests and responses shall be by email only. Likewise, unless otherwise agreed or ordered, exhibits to discovery responses shall be served electronically at the same time as such responses.

P. Discovery requests (interrogatories, requests for production of documents, and requests for admissions, but not the pleading, instructions, etc.) and responses thereto shall be provided in Word or another native format.

Q. An order of the Commission is not required for agreements between or among any of the participants regarding discovery matters. All other participants shall be notified of such agreements.

R. Motions regarding any discovery dispute shall not be considered unless accompanied by a statement that the participants have made a good faith effort to resolve the dispute but were unable to do so.

S. The Commission's Rules of Procedure at 1.2.2.-2.40 NMA, shall apply in this case except as modified or varied by order of the Commission. The Rules of Procedure can be obtained from the offices of the Commission and are available online at the official NMAC website, <http://www.nmprc.state.nm.us/nmac/>.

T. The procedural dates and requirements established in this Order are subject to further order or ruling of the Commission. Interested persons should contact the Commission at (505) 827-6956 for confirmation of the hearing date, time, and place since hearings are occasionally rescheduled or, if deemed not required or necessary, canceled at the discretion of the Commission.

U. Kit Carson's Petition together with the supporting direct testimony and exhibits may be examined on the Kit Carson website at: www.kitcarson.com.

V. This Notice and Procedural Order is effective immediately.

ANY PERSON WITH A DISABILITY REQUIRING SPECIAL ASSISTANCE IN ORDER TO PARTICIPATE IN HIS PROCEEDING SHOULD CONTACT THE

COMMISSION AT LEAST 24 HOURS PRIOR TO THE COMMENCEMENT OF THE HEARING, AT EITHER (505) 827-4500 OR 888-427-5772.

ISSUED AT Santa Fe, New Mexico this ____ day of June, 2020.

NEW MEXICO PUBLIC REGULATION COMMISSION

Via Email

June 4, 2020

Records

New Mexico Public Regulation Commission
1120 Paseo de Peralta
Santa Fe, New Mexico 87501

Re: In the Matter of the Verified Petition of Kit Carson Electric Cooperative, Inc. and Kit Carson Internet for Designation as an Eligible Telecommunications Carrier and Request for Expedited Consideration by the New Mexico Public Regulation Commission

Dear Sir or Madam:

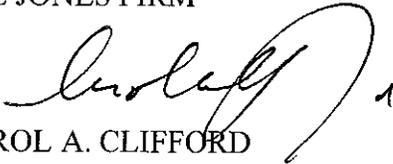
Our firm represents Kit Carson Electric Cooperative, Inc. and Kit Carson Internet. On behalf of Kit Carson, we are enclosing for filing with the New Mexico Public Regulation Commission an electronic copy of Kit Carson's Verified Petition for Designation as an Eligible Telecommunications Carrier and Request for Expedited Consideration by the New Mexico Public Regulation Commission. A copy of a check in the amount of \$25.00 to cover the filing fee is enclosed. The check will be sent by mail.

Please return an endorsed copy to me. Thank you for your assistance.

Very truly yours,

THE JONES FIRM

By



CAROL A. CLIFFORD

cc: For Kit Carson:
Mr. Luis Reyes, Jr., CEO

For the Commission:
Mr. Mike Ripperger
Joan Ellis, Esq.
Cholla Khoury, Esq.
Robert Lundin, Esq.
Russell Fisk, Esq.

O. RUSSELL JONES (1912-1978)
JAMES E. SNEAD (Retired)

JERRY WERTHEIM
JERRY TODD WERTHEIM
CAROL A. CLIFFORD
JENNY F. KAUFMAN
JIADAI LIN
AUTUMN BERGH

ATTORNEYS AT LAW



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE VERIFIED)
PETITION OF KIT CARSON ELECTRIC)
COOPERATIVE, INC. AND KIT CARSON)
INTERNET FOR DESIGNATION AS AN) Case No. _____
ELIGIBLE TELECOMMUNICATIONS CARRIER)**

**VERIFIED PETITION OF KIT CARSON ELECTRIC COOPERATIVE, INC. AND KIT
CARSON INTERNET FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER FOR LIMITED PURPOSES AND
REQUEST FOR EXPEDITED CONSIDERATION
BY THE NEW MEXICO PUBLIC REGULATION COMMISSION**

KIT CARSON ELECTRIC COOPERATIVE, INC. AND KIT CARSON INTERNET
(together "Kit Carson"), by and through their counsel, Jones, Snead, Wertheim & Clifford, P.A.,
hereby submits their Verified Petition for Designation as an Eligible Telecommunications
Carrier and Request for Expedited Consideration by the New Mexico Public Regulation
Commission ("Commission") pursuant to the Commission's State Rural Universal Service Fund
("SRUSF") Rule. 17.11.10.24 NMAC. Kit Carson seeks designation as an Eligible
Telecommunications Carrier ("ETC") to allow Kit Carson to apply and qualify for Commission
Broadband Program benefits (17.11.10.31 NMAC), and future benefits from federal programs.
Kit Carson requests that the limited ETC designation apply only for the specific broadband
project areas, if any, for which Kit Carson is awarded Broadband Program grants by the
Commission.

The following Exhibits accompany this Verified Petition:

- Exhibit A: Map Kit Carson Electric Cooperative service territory;
- Exhibit B: Direct Testimony of Luis A. Reyes Jr.; and
- Exhibit C: Kit Carson Internet Services, Packages and Rates.

In support of its Verified Petition, Kit Carson states:

1. Kit Carson Electric Cooperative, Inc. is a New Mexico electric cooperative created in 1944. Kit Carson Internet is a division of Kit Carson Electric Cooperative. Kit Carson operates as a competitive local exchange carrier (“CLEC”) pursuant to authority granted by the Commission by Final Order issued February 20, 2001, in the case captioned *In the Matter of the Application of Kit Carson Electric Cooperative, Inc. for a Certificate of Registration to Provide Competitive Local Exchange Telecommunications Services Within the State of New Mexico*, Utility Case Number 3406.

2. Kit Carson provides wireline competitive local exchange telecommunications services to approximately 7,400 residential and business customers in various communities and surrounding rural areas in Taos , Rio Arriba, and Colfax Counties. Kit Carson also offers broadband internet access service and intrastate long-distance service to its VoIP customers. Kit Carson does not currently have a Lifeline service offering for its New Mexico customers. Kit Carson’s current network and service footprint coincides with its electric power network. *See Exhibit A.*

3. Kit Carson has not been designated by the Commission as an ETC for its CLEC operations and, therefore, is not currently eligible under the Commission’s SRUSF Rule to apply for project grants under the Broadband Program. 17.11.10.32.A NMAC. However, Kit Carson is aware of areas within its CLEC service territory that are presently unserved or underserved by broadband as defined in the Commission’s SRUSF Rule and it has applied for Broadband Program grants to help fund construction of facilities that are capable of providing broadband service to customers in those unserved or underserved areas.

4. On April 17, 2020, Kit Carson filed a Broadband Fund Application (“Broadband Application”) in a docket created for 2020 Broadband Program applications, NMPRC Case No. 20-00099-UT. Through its Broadband Application, Kit Carson seeks \$634,688 in Broadband Program Funds to serve approximately 550 low and moderate-income families in its current service area. Kit Carson is investing additional funds to bring the project total investment to \$846,250. The Broadband Application seeks funding to allow Kit Carson to provide VoIP (voice-over-internet protocol) and high-speed broadband service with speeds at or greater than 25/25 Mbps and up to 50/50 Mbps. Kit Carson’s proposed broadband connection will allow families with students (including Taos and Picuris Tribal members), teachers, and first responders access to distance learning, telemedicine, and remote employment. Because of the COVID-19 pandemic, the need for these internet connections is urgent.

5. Kit Carson is seeking expedited consideration of this Verified Petition to allow it to obtain Broadband Program support for the project described in its Broadband Application. Given the urgent need for internet connections for distance learning, telemedicine, and distance work arising from the COVID-19 pandemic, Kit Carson asks the Commission to approve this Verified Petition and the Broadband Application in sufficient time for Kit Carson to build internet connections by the time school commences in the fall of 2020. Kit Carson is not seeking SRUSF support, other than Broadband Program support, at this time.

6. In view of the urgent nature of the Broadband Application and to assure the timely consideration of this Verified Petition, Kit Carson requests that the Commission hear this Verified Petition and not refer this matter to a hearing examiner. Precedent for expedited consideration by the Commission includes several ETC applications granted in 2018 for the purpose of allowing the applicants to obtain federal funding. *See In the Matter of the*

Application of SW Dinehnet, LLC for Designation as an Eligible Telecommunications Carrier, NMPRC Case No. 18-00260-UT; In the Matter of Federal Eligible Telecommunications Carrier Designation Proceedings For FCC Connect America Fund Phase II Auction Winners, NMPRC Case No. 18-00284-UT.

7. Kit Carson also seeks federal ETC designation to permit it to participate in future Federal Communications Commission (“FCC”) programs that would provide funding for expansion of its network to serve additional unserved and underserved households in its service territory.

8. The Commission has authority under the New Mexico Rural Telecommunications Act, § 63-9H-6(E) NMSA 1978, and its SRUSF Rule, 17.11.10.24 NMAC, to grant the ETC designation requested by Kit Carson.

9. Kit Carson satisfies all potentially applicable standards for the proposed ETC designation, as shown below.

- (i) Description of proposed ETC service area [17.11.10.24.A(1) NMAC; 54.202(a)(1)(ii)]

Kit Carson’s proposed ETC service area for purposes of this Verified Petition is the specific area or areas for which Kit Carson is awarded Broadband Program grants for the project described in its Broadband Application. After the COVID-19 pandemic hit communities served by Kit Carson, the cooperative was contacted by schools, colleges, and other government organizations to find out how Kit Carson could assist by providing broadband connections for distance learning, remote work, and telemedicine. Kit Carson targeted low and moderate-income students and their teachers by communicating directly with the following school districts and colleges: Taos Day School; Taos Municipal School; Peñasco Independent Schools; Questa

Independent Schools; Cimarron Municipal Schools (also serving Eagle Nest and Angel Fire); Mesa Vista Consolidated Schools; Northern New Mexico College; and UNM-Taos.

Governors of Taos and Picuris Pueblos, Public School Superintendents, and their staffs assisted Kit Carson in identifying students who needed in-home broadband connections to make distance learning possible. The broadband needs of this group of customers is the heart of Kit Carson's Broadband Application. With this Verified Petition, Kit Carson seeks an ETC designation that will allow it to serve these potential customers and others who are similarly situated.

In future years, Kit Carson's ETC service area will be defined by the location of any federal or state program grants that are approved by the Commission or FCC. In the event that Kit Carson's Verified Petition for ETC designation is granted in this case, Kit Carson requests that the docket remain open so Kit Carson can supplement the record on a periodic basis to advise the Commission of state Broadband Program grants, and other federal grants awarded to Kit Carson in future years.

(ii) Federal requirements for ETC designation [17.11.10.24.A(2) NMAC]

In implementing Section 214(e) and 254 of the Communications Act of 1934, as amended, the FCC has identified services that a carrier must provide to be designated as an ETC and receive universal service fund support. The required services include the following: single-party service; local usage; voice-grade access to the public switched network; dual tone multi-frequency signaling or its functional equivalent; access to operator services; access to emergency services; access to directory assistance; and toll limitation for qualifying low-income consumers. See 47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a). Kit Carson is capable of providing and will offer all the required services in its proposed ETC designated service areas and will actively

advertise the availability of these services through several different media outlets and through the schools and Pueblos. Kit Carson advertises its services on its website, in local newspapers, public member meetings, KCEC Monthly newsletter, on social media, and in brochures and other media as necessary.

- (iii) Public interest and Customer Choice [17.11.10.24.A(3) & (10) NMAC; 47 U.S.C. § 214e(1); 47 C.F.R. § 54.202(b)]

Granting Kit Carson's Verified Petition will promote the public interest by providing customers in Kit Carson's ETC service area with: (1) additional choice among providers to obtain reliable and high quality local and long distance telecommunications service at just, reasonable, and affordable rates; (2) additional choice among providers to obtain advanced telecommunications and information services; and (3) access in unserved and underserved rural areas, to broadband internet access services that are reasonably comparable to the same services provided in urban areas at competitive prices. These public interests are promoted especially by the urgent need for broadband connections for families, teachers, and first responders during the COVID-19 pandemic.

- (iv) Ability to remain functional in emergency situation [17.11.10.24.A(6) NMAC; 47 C.F.R. § 54.101(a)(1); 47. C.F.R. § 54.202(a)(2)]

Kit Carson has the ability to remain functional in emergency situations as required by FCC rules. Kit Carson has backup power at its headquarters, command center, and substations. This backup power is available to support telecommunications and internet switches and servers. Kit Carson can demonstrate that its network is built to United States Department of Agriculture, Rural Utilities Service, NESC, and IEEE standards. Kit Carson commits to comply with all applicable reporting requirements of the FCC with respect to outages. For reporting service

outages, Kit Carson uses automated calling to affected areas, emails, social media, and its website.

- (v) Compliance with applicable consumer protection and service quality standards
[17.11.10.24.A(7) NMAC; 47 C.F.R. § 54.202(a)(3) NMAC]]

Kit Carson commits to compliance with all applicable state and federal consumer protection and service quality standards. *See* Paragraph 9(iv) *supra*. Kit Carson uses GPON (Giga-Bit Passive Optic Network) technology on a fiber connection to the home. Kit Carson meets USDA/RUS construction standards. It has three different diverse routes out of its core network in Taos. Redundant power at the core ensures no down time and 24x7x365 monitoring.

- (vi) Description of services to be offered [17.11.10.24.A(8) NMAC; 47 C.F.R. § 54.101(a)(1)]

If Kit Carson's proposed ETC designation is granted and the projects proposed by it as part of its 2020 Broadband Application are approved for broadband grant awards, Kit Carson will use its own facilities to provide the following services to customers in its ETC designated service areas:

- (a) Voice grade access to the public switched telephone network through provisions of VoIP service that is interconnected to the public switched telephone network. The VoIP plans offered by Kit Carson will be competitively priced and will include minutes of use for local service at no additional charge to end users.
- (b) Broadband internet access service at speeds at or above the requirements of the Commission's Broadband Program and at competitive prices that will be

comparable to or better than the offerings of the Incumbent Local Exchange Carrier offering service to customers in the area.

- (c) Upon completion of any broadband construction projects approved for 2020 or future years, Kit Carson commits to provide all supported services throughout the designated ETC service areas within a reasonable time. Kit Carson's ETC designated service areas for 2020 will include Picuris and Taos Pueblo lands with the approval of the Pueblos.

Kit Carson has established a reasonable cost for both VoIP and high-speed broadband. Pricing starts at \$49.90 for 50/50 Mbps, and \$25.00 per month for a VoIP bundle targeting low-income customers and students. A list of Kit Carson's services, packages, rates, and applicable taxes and surcharges is attached as Exhibit C.

Kit Carson's services are comparable to those offered by other providers operating in its territory. The following providers operate in Kit Carson's territory: CenturyLink offers voice and internet services; Taos Net offers wireless internet services; Comcast offers video, voice, and internet services in Taos; and Hughes Net offers satellite-based internet service.

- (vii) Acknowledgement regarding equal access [17.11.10.24.A(9) NMAC]

Kit Carson acknowledges that it may be required to provide equal access if all other ETCs in its ETC designated service area relinquish their designations.

- (viii) Impact of the proposed designation on the size of the SRUSF [17.11.10.24.A(11) NMAC]

The Commission annually dedicates at least \$5 million from the SRUSF to the Broadband Program. 17.11.10.31.B NMAC. Kit Carson's pending Broadband Application requests \$634,688. This amount is well within the annual Broadband Program allocation. There

are two other applicants for 2020 Broadband Program Grants at this time. *See* NMPRC Case No. 20-00099-UT.

- (ix) Unique qualities of Kit Carson's proposed broadband service [17.11.10.24.A(12) NMAC; 47 C.F.R. §54.202(a)(2) & c]]

The unique qualities of Kit Carson's broadband services are thoroughly recited in its Broadband Application on file in Case 20-00099-UT. Kit Carson's project is premised on its partnership with schools and Tribal governments. This partnership has allowed Kit Carson to identify the families that need internet connections to meet the challenges presented by the COVID-19 pandemic.

- (x) Willingness and ability to provide services within a reasonable time [17.11.10.24.A(13) NMAC; 47 C.F.R. § 54.202(a)(1)(ii)]

Under the Commission's SRUSF Rule, any project for which a grant is awarded must be completed within three (3) years. 17.11.10.31.H(1) NMAC. Kit Carson is willing and able to provide all required services to customers in its ETC service area promptly upon completion of the projects for which grants may be awarded. If this Verified Petition and the Broadband Application are granted promptly, Kit Carson hopes that the customer connections for its broadband project will be completed before the start of the school year this fall.

- (xi) Request for waiver related to inapplicable provisions of the SRUSF Rule

Kit Carson requests a waiver of two provisions of the SRUSF Rule pertaining to designation of ETCs: 17.11.10.24.A(4) NMAC (information related to support based on need) and 17.11.10.24.A(5) NMAC (a five-year plan for use of funds). Kit Carson is not seeking support based on a showing of need under 17.11.10.25 NMAC, it should not be required to

provide information required by that portion of the Rule. The requirement of 17.11.10.24.A(4) NMAC should be waived.

At this time, Kit Carson is only seeking funds from the Broadband Program for one year, therefore the requirement of the Rule that Kit Carson provide a “five-year plan demonstrating how support from the fund will be used” should be waived. Kit Carson’s Broadband Application amply demonstrates how it will use Broadband support to improve coverage, service quality, and capacity in the areas where it has shown a demonstrated demand for broadband. Future applications for Broadband support will be addressed in future Broadband Program filings compliant with the Rule at 17.11.10.31.B NMAC.

10. This Verified Petition is supported by the Verification of Luis Reyes, Jr., CEO of Kit Carson Electric Cooperative, Inc. and Kit Carson Internet.

11. This Verified Petition is also supported by the Direct Testimony of Mr. Reyes accompanying this Verified Petition as Exhibit B.

Request for expedited consideration by the Commission

12. Kit Carson respectfully requests that the Commission expeditiously consider and grant this Verified Petition on or before July 29, 2020. Kit Carson urges the Commission to immediately place this Verified Petition on Public Notice, to implement a rapid schedule for consideration of it, and take all necessary steps to move this Verified Petition to final action. Kit Carson proposes the following schedule for this matter:

June 10, 2020 Commission adopts a schedule for the Case at its open meeting;

June 17, 2020 Kit Carson to serve of notice to the Commission telecommunications list;

July 1, 2020 Commission Staff and Intervenors to file comments on the Verified Petition;

July 15, 2020 Kit Carson replies to Staff and Intervenor comments; and

July 29, 2020 Commission conducts a hearing on the Verified Petition after its open meeting and adopts a final order.

13. At hearing, the Commission may permit oral testimony and cross-examination. The Commission took similar action in 2018 to facilitate ETC designations for certain carriers in order to allow them to participate in the FCC's Connect America Fund II Auction 903. *See* NMPRC Case No. 18-00260- UT, *Initial Order* (issued Sept. 12, 2018).

14. The expeditious consideration of this Verified Petition will serve the public interest by enabling Kit Carson to use Broadband Program funds applied for through its Broadband Application to install internet connections needed by families, students, teachers, and first responders during the COVID-19 pandemic. This will allow these diverse customers to access distance learning, distance work, and telemedicine.

15. It is reasonable and necessary for the Commission to expedite approval of this Verified Petition within a timeframe that will allow Kit Carson to complete service installation by the start of the school year in the fall.

16. The provision of notice through the Commission's public internet docketing system and notice of a meeting where this Verified Petition could be considered by the Commission will suffice to protect the due process rights of interested parties and the requirements of the Open Public Meetings Act.

WHEREFORE, Kit Carson Electric Cooperative, Inc. and Kit Carson Internet, respectfully request that the New Mexico Public Regulation Commission grant the following relief:

A. Grant their request for ETC designation for the purpose of receiving funds from the Broadband Program based on their pending Broadband Application, and any future application to the Program;

B. Grant their request for federal ETC designation for the purpose of participating in federal broadband programs and other federal programs in the future; and

C. Grant their request for expedited consideration by the Commission to permit Kit Carson to receive Broadband Program funds in the 2020 funding year to be able to address the need for internet connections for families, students, Tribal members, teachers, and first responders which has become urgent due to the COVID-19 pandemic, as more fully described in Kit Carson's Broadband Application.

Respectfully submitted,

/s/Carol A. Clifford

Carol A. Clifford
Jones, Snead, Wertheim & Clifford, P.A.
141 E. Palace Avenue, Suite 220
P.O. Box 2228
Santa Fe, New Mexico 87504-2228
Telephone: (505) 989-6215
carol@thejonesfirm.com

**ATTORNEYS FOR KIT CARSON
ELECTRIC COOPERATIVE, INC. AND
KIT CARSON INTERNET**

Kit Carson Electric Cooperative

Kit Carson Internal Service Territory

- Legend**
-  KCE Customer Locations
 -  KCE Service Boundary



Google Earth

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Image Landsat / Copernicus

Exhibit A

518

30 mi



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE VERIFIED)
PETITION OF KIT CARSON ELECTRIC)
COOPERATIVE, INC. AND KIT CARSON)
INTERNET FOR DESIGNATION AS AN) Case No. _____
ELIGIBLE TELECOMMUNICATIONS CARRIER)**

DIRECT TESTIMONY

OF

LUIS A. REYES JR.

**ON BEHALF OF KIT CARSON ELECTRIC COOPERATIVE, INC. AND
KIT CARSON INTERNET**

June 4, 2020

EXHIBIT B

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Luis A. Reyes, Jr.. My business address is 118 Cruz Alta Road, Taos, New
4 Mexico 87571.

5

6 **Q. BY WHOM ARE YOU EMPLOYED?**

7 A. I am employed by the Petitioners, Kit Carson Electric Cooperative, Inc. and Kit Carson
8 Internet (together, "Kit Carson") as the Chief Executive Officer of each entity.

9

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

11 A. The purpose of my testimony is to support the Verified Petition of Kit Carson for
12 Designation as an Eligible Telecommunications Carrier ("ETC") in New Mexico (the
13 "Verified Petition").

14

15 **Q. WHAT IS KIT CARSON'S PURPOSE IN FILING THE VERIFIED PETITION?**

16 A. Kit Carson requests ETC designation for the purpose of providing voice and broadband
17 internet services to unserved and under-served areas of the state as more specifically
18 described in Kit Carson's Broadband Fund Application filed in Commission Case No. 20-
19 00099-UT on April 17, 2020 ("Broadband Application"). Initially, Kit Carson seeks
20 designation as an ETC to apply and qualify for the Commission's Broadband Program
21 benefits (17.11.10.31 NMAC). In the future, Kit Carson may apply to other state and
22 federal programs, but, at this time, a grant of ETC designation would apply to the areas
23 described in the April 17, 2020, Application.

24

1 **II. 2020 BROADBAND APPLICATION**

2 **Q. HOW WILL KIT CARSON USE ITS ETC DESIGNATION?**

3 A. If designated a New Mexico ETC, Kit Carson will use that designation to provide voice
4 and broadband services to low and moderate-income students, their families and teachers,
5 members of the Picuris and Taos Pueblos, and first responders. These communities need
6 broadband services to facilitate distance learning, telemedicine, and remote work in the
7 wake of the COVID-19 pandemic. Kit Carson hopes to have its broadband services
8 functional by the start of school in the fall of 2020.

9

10 **Q. WHY IS KIT CARSON SEEKING APPROVAL ON OR BEFORE JULY 29, 2020?**

11 A. Approval of Kit Carson's Verified Petition for ETC Designation on or before July 29,
12 2020, would enable Kit Carson to install service before the start of school if the Verified
13 Petition and Broadband Application are approved by July 29. Kit Carson has worked
14 closely with the School Superintendents, Chancellor of UNM-Taos, President of NNMC,
15 and Governors of the Picuris and Taos Pueblos to identify students in need of broadband
16 connections. Other potential users of the services include low and moderate-income
17 families, educators, and first responders.

18

19 **III. KIT CARSON WILL MEET ALL FEDERAL REQUIREMENTS FOR EXPANDED**
20 **ETC DESIGNATION.**

21 **Q. WILL KIT CARSON MEET ALL FEDERAL REQUIREMENTS TO BE**
22 **DESIGNATED AS AN ETC?**

DIRECT TESTIMONY OF LUIS A REYES JR.
NMPRC Case No. 20-_____ -UT

1 A. Yes, Kit Carson will meet all requirements set forth in the Communications Act of 1934,
2 as amended (the "Act"), including 47 U.S.C. §§ 214(e)(1)(A) and (B), 47 CFR § 54.101(a),
3 and 47 C.F.R. § 54.202(a).

4
5 **Q. WHAT ARE THE FEDERAL STATUTORY REQUIREMENTS? [47 U.S.C. §§**
6 **214(e)(1)(A) and (B)].**

7 A. Under the Communications Act, Kit Carson has to meet the following requirements:

8 (a) it must be a common carrier; and

9 (b) throughout the service areas for which the designation is received, it must

10 i. offer the services that are supported by the federal universal service support
11 mechanisms under Section 254(c); and

12 ii. advertise the availability of such services and the charges using media of
13 generation distribution.

14
15 **Q. HOW WILL KIT CARSON MEET THESE REQUIREMENTS?**

16 A. Kit Carson Electric Cooperative, Inc. holds a certificate of registration as a competitive
17 local exchange carrier issued by the Commission in 2001. As shown below, Kit Carson
18 will offer services that are supported by the federal universal service support mechanism in
19 the newly designated area, although Kit Carson is not seeking such support at this time.
20 Kit Carson advertises its services on its website, in local newspapers, on social media,
21 public member meetings, KCEC monthly newsletters, and in brochures and other media as
22 necessary.

23

DIRECT TESTIMONY OF LUIS A REYES JR.
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1 **Q. WHAT ARE THE REQUIREMENTS OF FEDERAL REGULATIONS? [47 CFR §**
2 **54.101(a) and (b) & 54.202(a)].**

3 A. As an ETC, Kit Carson must offer supported services for rural, insular and high cost areas.
4 These services include the following:

5 a. Voice-grade access to the public switched network or its functional equivalent;

6 b. Minutes of use for local service at no additional charge to end users;

7 c. Access to 911 and E911 Emergency Service;

8 d. Toll limitation on qualified low-income customers;

9 e. Broadband internet access;

10 f. Service within a reasonable time to CBGs;

11 g. Functionality during emergency situations;

12 h. Attainment of consumer protection and service quality commitments; and

13 i. Advertising of supported services.

14

15 **Q. WHAT OTHER REQUIREMENTS OF FEDERAL REGULATIONS MUST KIT**
16 **CARSON MEET?**

17 A. Kit Carson must make service available within a reasonable time. It must also meet
18 service quality commitments and advertise the availability of supported services.

19

20 **Q. HOW WILL KIT CARSON MEET THESE FEDERAL REQUIREMENTS?**

21 A. As an ETC designated in the areas targeted by its Broadband Application, Kit Carson will
22 provide state-of-the-art voice and high-speed internet service.

23

DIRECT TESTIMONY OF LUIS A REYES JR.
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1 Kit Carson will offer upon designation as an ETC in New Mexico all of the services and
2 functionalities required by Sections 54.101(a) and 54.202(a) of the FCC's Rules (47 C.F.R.
3 § 54.101(a) & (b), 54.202(a)).
4

5 I certify on behalf of that it is financially and technically qualified to provide, and intends
6 to offer, all of the services designated by the FCC for support through the Commission's
7 Broadband Program as well as federal programs that Kit Carson may apply for in the
8 future, including voice telephony services meeting the FCC's requirements.
9

10 I further certify that Kit Carson will comply with the service requirements applicable to the
11 support it receives from the FCC. 47. C.F.R. § 54.202(a)(1)(i).
12

13 **IV. KIT CARSON MEETS ALL NEW MEXICO REQUIREMENTS FOR ETC**
14 **DESIGNATION.**

15 **Q. WILL KIT CARSON COMPLY WITH NMPRC RULES GOVERNING ETCs?**

16 A. Yes. Kit Carson will comply with the NMPRC rules which govern ETCs, including all
17 reporting requirements concerning existing and newly designated ETC service areas.
18

19 **Q. WHAT ARE THE FCC AND NEW MEXICO COMMISSION'S REQUIREMENTS**
20 **AND HOW WILL KIT CARSON MEET THEM?**

21 A. The requirements that are relevant to Kit Carson's Verified Petition include the following:

- 22 a. Description of the proposed service area. 47 C.F.R. § 54.202(a)(1)(ii) &
23 17.11.10.24.A(1) NMAC.

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NMPRC Case No. 20-_____ -UT

1 Kit Carson's proposed service area is only the area targeted by the Broadband
2 Application. Targeted customers include low and moderate-income students and their
3 families who attend the following schools: Taos Day School; Taos Municipal School;
4 Peñasco Independent Schools; Questa Independent Schools; Cimarron Municipal
5 Schools (also serving Eagle Nest and Angel Fire); Mesa Vista Consolidated Schools;
6 Northern New Mexico College; and UNM-Taos. Other targeted customers include low
7 to moderate income volunteer fire fighters and first responders in the same areas as the
8 students and teachers. *See also* Exhibit A to Verified Petition.

9
10 b. Kit Carson meets the requirements of the federal Act at 47 U.S.C. § 214(e), as
11 demonstrated above. 17.11.10.24.A(2) NMAC.

12
13 c. Kit Carson's proposed designation is in the public interest and will result in more
14 customer choice. 47 U.S.C. § 214(e)(1), 47 C.F.R. § 54.202(b) & 17.11.10.24.A(3)
15 NMAC..

16 Designation of Kit Carson as an ETC will serve the public interest. Kit Carson will
17 provide the following: 1) quality services at just, reasonable, and affordable rates; 2)
18 access to advanced telecommunications and information services; and 3) access in rural
19 and high cost areas to telecommunications and information services reasonably
20 comparable to those services provided in urban areas and available at rates reasonably
21 comparable to rates charged for similar services in urban areas. *See* 47 U.S.C. §
22 254(b).

23

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1 A majority of the consumers within the area where Kit Carson intends to install its
2 broadband network have little to no access to broadband-enabled services that will
3 permit distance learning, telemedicine, and remote work. If Kit Carson receives this
4 designation, it will be eligible to receive Broadband Program support for the targeted
5 areas and will be able to provide broadband services at reasonable rates.

6
7 d. Kit Carson will remain functional in emergency situations. 47 C.F.R. § 54.101(a)(1),
8 47 C.F.R. § 54.202(a)(2) & 17.11.10.24.A(6) NMAC.

9 Kit Carson will have the ability to remain functional in emergency situations, including
10 an amount of back-up power to ensure functionality without any external power source
11 for a reasonable period of time, the ability to re-route traffic around damaged facilities,
12 and the ability to manage traffic spikes resulting from emergency situations.

13
14 Kit Carson has backup power at its headquarters, command center, and substations.
15 This backup power is available to support telecommunications and internet switches
16 and servers. Kit Carson can demonstrate that its network is built to United States
17 Department of Agriculture, Rural Utilities Service, NESC, and IEEE standards. For
18 reporting service outages, Kit Carson uses automated calling to affected areas, emails,
19 social media, and its website.

20
21 e. Kit Carson will satisfy consumer protection and service quality standards. 47 C.F.R. §
22 54.202(a)(3) & 17.11.10.24.A(7) NMAC.

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1 Kit Carson will comply with the following consumer protection standards as enacted
2 by the New Mexico Legislature or promulgated by the FCC and the Federal Trade
3 Commission:

- 4 • FCC rules regarding verification of orders for telecommunications service
5 as required of submitting carriers (47 CFR § 64.1100);
6
- 7 • The FCC's Truth-in-Billing Requirements (47 CFR § 64.2400);
8
- 9 • All of the requirements of 47 C.F.R. § Part 64 Subpart U, Customer
10 Proprietary Network Information and Federal Trade Commission Identity
11 Theft Red Flags (16 C.F.R. § 681.1); and
12
- 13 • The statutory prohibitions against slamming and cramming contained in
14 NMSA 1978, § 93 9G-1 through and including 93-9G-9.
15

16 Kit Carson uses GPON (Giga-Bit Passive Optic Network) technology on a fiber
17 connection to the home. Kit Carson meets USDA/RUS construction standards. It has
18 three different diverse routes out of its core network in Taos. Redundant power at the
19 core ensures no down time and 24x7x365 monitoring.

20
21 f. Kit Carson will offer local usage plans that are comparable to those offered by
22 incumbent local exchange carriers in areas for which Kit Carson's seeks designation.
23 47 C.F.R. § 54.101(a)(1) & 17.11.10.24.A(8) NMAC. *See Exhibit C to the Verified*
24 *Petition.* The following providers operate in Kit Carson's territory: CenturyLink offers
25 voice and internet services; Taos Net offers wireless internet services; Comcast offers
26 video, voice, and internet services in Taos; and Hughes Net offers satellite-based
27 internet service.

28
29 g. Kit Carson acknowledges that it may be required to provide equal access if all other
30 ETCs in the designated areas relinquish their designations. 17.11.10.24.A(9) NMAC.

DIRECT TESTIMONY OF LUIS A REYES JR.
NMPRC Case No. 20-_____ -UT

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h. Kit Carson’s voice and internet service offerings have unique advantages. 47 C.F.R. § 54.202(a)(2) & (c) & 17.11.10.24.A(12) NMAC.

The unique qualities of Kit Carson’s broadband services are thoroughly recited in its Broadband Application on file in Case 20-00099-UT. Kit Carson’s project is premised on its partnership with schools and Tribal governments. This partnership has allowed Kit Carson to identify the families that need internet connections to meet the challenges presented by COVID-19. Kit Carson’s voice services will be provided. The broadband needs of this group of customers is the heart of Kit Carson’s Broadband Application. With its Verified Petition, Kit Carson seeks an ETC designation that will allow it to serve these potential customers and others who are similarly situated.

i. Kit Carson will expand its network to serve the areas that are the subject of Broadband Application within a reasonable time frame. 47 C.F.R. § 54.202(a)(1)(ii) & 17.11.10.24.A(13) NMAC.

If Kit Carson’s Verified Petition is granted on an expedited schedule. Kit Carson plans to install service to approximately 550 households to facilities distance learning, telemedicine, and remote work by the start of school in the fall. If the status of the COVID-19 pandemic in northern New Mexico warrant continuation of online instruction and remote work, these customers will be prepared.

1 **V. DESIGNATION OF KIT CARSON AS AN ETC SERVES THE PUBLIC**
2 **INTEREST.**

3 **Q. HOW DOES DESIGNATION OF KIT CARSON AS AN ETC SERVE THE PUBLIC**
4 **INTEREST? 47 U.S.C. § 214(e)(1), 47 C.F.R. § 54.202(b) & 17.11.10.24(B) NMAC.**

5 A. Grant of an ETC designation to Kit Carson will further the public interest by permitting Kit
6 Carson to offer the services described in its Broadband Application in an expeditious
7 manner. This includes Kit Carson's provision of the following: 1) quality services at just,
8 reasonable, and affordable rates; 2) access to advanced telecommunications and
9 information services; and 3) access in rural and high cost areas to telecommunications and
10 information services reasonably comparable to those services provided in urban areas and
11 available at rates reasonably comparable to rates charged for similar services in urban
12 areas. *See* 47 U.S.C. Section 254(b).

13
14 If Kit Carson receives this ETC designation and Broadband Program funding, it will be
15 able to provide broadband services at reasonable rates to residents of the town of Taos,
16 Taos County, Rio Arriba, and Colfax Counties.

17
18 **VI. REQUEST FOR EXPEDITED CONSIDERATION.**

19 **Q. WHY HAS KIT CARSON REQUESTED EXPEDITED CONSIDERATION OF ITS**
20 **ETC APPLICATION?**

21 A. In order to qualify to receive Broadband Program funding and complete its broadband
22 project before the start of the school year, Kit Carson must obtain ETC designation by the
23 end of July, 2020.

DIRECT TESTIMONY OF LUIS A REYES JR.
NMPRC Case No. 20-_____ -UT

1 **VII. CONCLUSION.**

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

3 A. Yes.

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

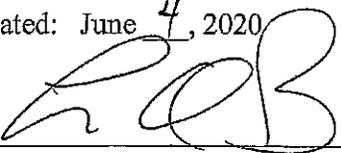
IN THE MATTER OF THE VERIFIED)
PETITION OF KIT CARSON ELECTRIC)
COOPERATIVE, INC. AND KIT CARSON)
INTERNET FOR DESIGNATION AS AN) Case No. _____
ELIGIBLE TELECOMMUNICATIONS CARRIER)

VERIFICATION

State of New Mexico)
) ss.
County of Taos)

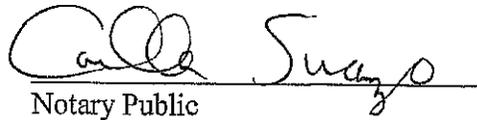
I, LUIS A. REYES JR., CEO of Kit Carson Electric Cooperative, Inc. and Kit Carson Internet (together, "Kit Carson"), being duly sworn, state:

I am the witness identified in the preceding direct testimony. I have read the direct testimony and am familiar with its contents. Based on my personal knowledge, the facts stated in the testimony are true and correct to the best of my knowledge, information, and belief.

Dated: June 4, 2020


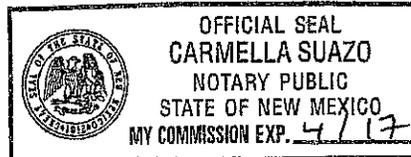
Luis A Reyes Jr., CEO
Kit Carson Electric Cooperative, Inc. and
Kit Carson Internet

The foregoing instrument was SUBSCRIBED AND SWORN TO before me this 4th day of June, 2020 by LUIS A. REYES JR., CEO of Kit Carson Electric Cooperative, Inc. and Kit Carson Internet, on behalf of those entities.


Notary Public

My Commission Expires:

4/17/2024



4/17/2024

**KIT CARSON INTERNET
SERVICES, PACKAGES AND RATES
2020**

Residential						
Packages & Rates	SPEED	Rate	Franchise Fee	Property Tax Fee	Tax	Total
Copper - LIHEAP	25/3	\$24.95	\$0.75	\$3.35	\$2.12	\$31.17
Copper Plus - LIHEAP	25/25	\$29.95	\$0.90	\$3.35	\$2.55	\$36.74
Turquoise	50	\$46.95	\$1.41	\$3.35	\$3.99	\$55.70
Silver	100	\$56.95	\$1.71	\$3.35	\$4.84	\$66.85
Gold	150	\$106.95	\$3.21	\$3.35	\$9.09	\$122.60
Diamond	250	\$149.95	\$4.50	\$3.35	\$12.75	\$170.54
Titanium	500	\$179.95	\$5.40	\$3.35	\$15.30	\$203.99
Platinum	1 Gig	\$204.92	\$6.15	\$3.35	\$17.42	\$231.84
Business						
Packages & Rates	SPEED	Rate	Franchise Fee	Property Tax Fee	Tax	Total
Turquoise Extreme 50	50	\$79.95	\$2.40	\$3.35	\$6.80	\$92.49
Turquoise Elite 50 (+SIP)	50	\$99.95	\$3.00	\$3.35	\$8.50	\$114.79
Silver Extreme 100	100	\$99.95	\$3.00	\$3.35	\$8.50	\$114.79
Silver Elite 100 (+SIP)	100	\$119.95	\$3.60	\$3.35	\$10.20	\$137.09
Gold Extreme 250	250	\$139.95	\$4.20	\$3.35	\$11.90	\$159.39
Gold Elite 250 (+SIP)	250	\$159.95	\$4.80	\$3.35	\$13.60	\$181.69
Titanium Extreme 500	500	\$189.42	\$5.68	\$3.35	\$16.10	\$213.45
Titanium Elite 500 (+SIP)	500	\$209.42	\$6.28	\$3.35	\$17.80	\$236.85
Platinum Extreme Gig	1 Gig	\$239.50	\$7.19	\$3.35	\$20.36	\$270.39
Platinum Elite Gig (+SIP)	1 Gig	\$259.50	\$7.79	\$3.35	\$22.06	\$292.69
Service Rates & Fees						
		Rate			Tax	Total
NSF Bank Fee		\$40.00				\$40.00
Reconnect Charge		\$50.00			\$4.25	\$54.25
Truck Roll/Customer Issue		\$105.00			\$8.93	\$113.93
Stand By Rate		\$27.50			\$2.34	\$29.84
Point to Point		\$55.00			\$4.68	\$59.68
Static IP		\$20.00			\$1.70	\$21.70
Router Monthly Lease		\$7.99			\$0.68	\$8.67
Res. Act. Fee NID/Shell/Program		\$87.50			\$7.44	\$94.94
Res Act. Fee NID/Program		\$65.00			\$5.53	\$70.53
Res Act. Fee All there/Prog. Only		\$40.00			\$3.40	\$43.40
Bus. Act. Fee NID/Shell/Program		\$125.00			\$10.63	\$135.63
Bus Act. Fee NID/Program		\$100.00			\$8.50	\$108.50
Bus Act. Fee All there/Prog. Only		\$75.00			\$6.38	\$81.38

The foregoing Verification was acknowledged before me this 4th day of June, 2020, by
LUIS A. REYES JR., CEO of Kit Carson Electric Cooperative, Inc. and Kit Carson Internet on
behalf of those entities.


NOTARY PUBLIC

My Commission Expires:

4/17/2024



BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF THE VERIFIED)
PETITION OF KIT CARSON ELECTRIC)
COOPERATIVE, INC. AND KIT CARSON)
INTERNET FOR DESIGNATION AS AN) Case No. _____
ELIGIBLE TELECOMMUNICATIONS CARRIER)**

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the Verified Petition of Kit Carson Electric Cooperative, Inc. and Kit Carson Internet for Designation as an Eligible Telecommunications Carrier For Limited Purposes and Request for Expedited Consideration by the New Mexico Public Regulation Commission to be delivered electronically as indicated on June 4, 2020, to the following:

Joan Ellis, Esq.
Joan.Ellis@state.nm.us

Mike Ripperger
Mike.Ripperger@state.nm.us

Cholla Khoury, Esq.
ckhoury@nmag.gov

Robert Lundin, Esq.
rlundin@nmag.gov

Russell Fisk
Russell.Fisk@state.nm.us

/s/Carol A. Clifford
CAROL A. CLIFFORD

6/04/20
\$25.00
Public Regulation Commission
Filing Fee
03241-001 Kit Carson

FOR SECURITY PURPOSES THE FACE OF THIS DOCUMENT CONTAINS A COLORED BACKGROUND AND MICROPRINTING IN THE BORDER

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Santa Fe, NM 87504-2228
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Santa Fe, NM 87504
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DATE
6/04/20

AMOUNT
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ORDER
OF



SECURITY FEATURES INCLUDED. DETAILS ON BACK

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