



PUBLIC NOTICE

Federal Communications Commission
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DA 26-204

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**DOMESTIC SECTION 214 APPLICATION GRANTED FOR THE ACQUISITION OF
CERTAIN ASSETS OF ARISTOTLE UNIFIED COMMUNICATIONS INC
BY BELZONI CABLE, LLC**

WC Docket No. 25-127

By this Public Notice, the Wireline Competition Bureau grants an application filed by Aristotle Unified Communications Inc (Aristotle) and Belzoni Cable, LLC (Belzoni Cable) (collectively, Applicants), pursuant to section 214(a) of the Communications Act of 1934, as amended, and section 63.04 of the Commission's rules,¹ requesting Commission approval to transfer Rural Digital Opportunity Fund (RDOF) support and related buildout and service obligations for five census blocks (Assigned Census Blocks) in Sharkey and Issaquena counties in Mississippi to Belzoni Cable.²

On April 18, 2025, the Bureau released a Public Notice seeking comment on the Application.³ The Bureau did not receive comments or petitions in opposition to the Application.

Applicants and Description of Transaction

Aristotle, an Arkansas corporation, provides voice and broadband service to 1,800 residential and business subscribers in rural communities in Arkansas.⁴ Aristotle is designated as an Eligible Telecommunications Carrier (ETC) for the Assigned Census Blocks in Mississippi.⁵ The Commission

¹ See 47 U.S.C. § 214(a); 47 CFR § 63.04.

² Domestic Section 214 Application filed for the Assignment of Certain Assets of Aristotle Unified Communications Inc, WC Docket No. 25-127 (filed Mar. 7, 2025) (Application). Applicants filed a supplement to the Application on September 22, 2025. Letter from Stephen E. Coran, Counsel to Aristotle Unified Communications, Inc, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 25-127 (filed Sept. 22, 2025) (Supplement Letter). Applicants also filed a letter providing voluntary commitments on February 4, 2026. Letter from L. Elizabeth Bowles, President and CEO, Aristotle Unified Communications, Inc., and Michael Stephen Donovan, Jr., CEO, Belzoni Cable, LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 25-127 (filed Feb. 4, 2026) (Voluntary Commitment Letter). Any action on the Application is without prejudice to Commission action on other pending applications.

³ See *Domestic Section 214 Application Filed for the Acquisition of Certain Assets of Aristotle Unified Communications Inc. by Belzoni Cable, LLC*, WC Docket No. 25-127, Public Notice, DA 25-348 (WCB 2024) (Public Notice).

⁴ Application at 3.

⁵ *Id.* See *Application for Designation as an Eligible Telecommunications for Purposes of Receiving Federal Universal Service Support for the Purpose of Receiving Support from the Connect America Fund Phase II, Request for Expansion of Designated Service Area as an Eligible Telecommunications Carrier*, Order, Docket No. 2018-UA-224, TC 123246900 (June 7, 2021) (expanding Aristotle's ETC designation to include RDOF locations in Mississippi (Study Area Code 289064)). We note that the Bureau has been directed to adopt revised location obligations no later than the end of program's sixth year using a listing of all qualifying locations within eligible areas. See *Rural Digital Opportunity Fund et al.*, WC Docket Nos. 19-126, 10-90, Report and Order, 35 FCC Rcd 686, 709, para. 45 (2020).

authorized Aristotle to receive \$27,380,296.90 in RDOF support to provide Gigabit (1 Gbps/500 Mbps) service to 7,498 unserved locations in Study Area Code 289064, including \$488,202.00 in RDOF support to serve 797 locations in the Assigned Census Blocks.⁶

Belzoni Cable, a Mississippi limited liability company, provides cable television, broadband, and voice services to residences and businesses to approximately 1,800 subscribers in rural Mississippi.⁷ Belzoni Cable is a designated ETC in Mississippi⁸ where it is authorized to receive \$6,697,849 in RDOF support to provide Gigabit service to 1,482 unserved location in Humphreys and Sharkey Counties in Mississippi.⁹ Belzoni Cable is wholly-owned by Michael Donovan, Jr., a U.S. citizen.¹⁰

Pursuant to the terms of the proposed transaction, Aristotle and Belzoni Cable entered into an Assignment and Assumption Agreement (Agreement) in which “Belzoni Cable agreed to acquire the Assigned Census Blocks from Aristotle and to assume the RDOF obligations thereunder.”¹¹ Applicants state that “Aristotle will convey to Belzoni Cable assets it acquired for the RDOF-supported deployment in the Assigned Census Blocks, including engineering plans, equipment and facilities, unexpended RDOF support, and the right to receive future RDOF support.”¹² As a result, any customers of Aristotle within the Assigned Census Blocks will become customers of Belzoni Cable.¹³

Public Interest Analysis

Pursuant to section 214(a) of the Communications Act of 1934, as amended (the Act),¹⁴ we must determine whether the proposed transfer of control to Belzoni Cable of authorizations held and controlled by Aristotle will serve the public interest, convenience, and necessity. We first assess whether the Proposed Transaction complies with the specific provisions of the Act, other applicable statutes, and the Commission’s rules.¹⁵ We then consider whether the transaction could result in public interest harms by

⁶ Application at 3-4; *Rural Digital Opportunity Fund Support Authorized for 1,345 Winning Bids*, AU Docket No. 20-34, WC Docket Nos. 19-126 & 10-90, Public Notice, 37 FCC Rcd 7271 Attach. A at 4-6 (AU/WCB 2022). Aristotle is not transferring its authorization for areas outside of the Assigned Census Blocks.

⁷ Application at 4.

⁸ *Id.* at 5; *Application for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Phase I Auction (Auction 904) Support for Voice and Broadband Services*, Order, Docket No. 2021-UA-0013 (June 7, 2021). Applicants state that Belzoni Cable will submit an application with the Mississippi Public Service Commission to expand its ETC designation to include the Assigned Census Blocks. Application at 2.

⁹ Application at 4-5. *See Rural Digital Opportunity Fund Support Authorized for 1,345 Winning Bids*, AU Docket No. 20-34, WC Docket Nos. 19-126, 10-90, Public Notice, 37 FCC Rcd 4897, Attach. A at 1 (AU/WCB 2022) (*RDOF Authorization Public Notice*) (authorizing Belzoni Cable to receive RDOF support for Study Area Code 289056).

¹⁰ Application at 12.

¹¹ *Id.* at 5.

¹² *Id.* at 5-6.

¹³ *Id.* at 6.

¹⁴ 47 U.S.C. § 214(a).

¹⁵ *See, e.g., Applications of Level 3 Communications, Inc. and CenturyLink, Inc. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 32 FCC Rcd 9581, 9585, para. 8 (2017) (*CenturyLink-Level 3 Order*); *Frontier Communications Parent, Inc. and Verizon Communications, Inc. Application for Consent to Transfer Control*, WC Docket No. 25-445, Memorandum Opinion and Order, 40 FCC Rcd 3156, 3160, para. 9 (WCB, OIA, WTB 2025) (*Verizon-Frontier Order*); *Application of Verizon Communications Inc. and Straight Path Communications, Inc. for Consent to Transfer Control of Local Multipoint Distribution Service, 39 GHz, Common Carrier Point-to-Point Microwave, and 3650-3700 MHz Service Licenses*, Memorandum Opinion and Order, 33 FCC Rcd 188, 189, para. 5 & n.11 (WTB 2018) (*Verizon-Straight Path Order*); *Applications of GCI*

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substantially frustrating or impairing the objectives or implementation of the Act or related statutes.¹⁶ Notably, the Commission has determined it may impose and enforce transaction-related conditions, or accept voluntary commitments, to ensure that the public interest is served by the transaction.¹⁷ We next consider a transaction's public interest benefits. Applicants bear the burden of proving those benefits by a preponderance of the evidence.¹⁸ As part of our public interest authority, we may impose conditions to ensure for the public the transaction-related benefits claimed by the Applicants.¹⁹

Based on the current record, and the Applicants' voluntary commitments, we find that there are no likely potential transaction-related public interest harms. Applicants state that the proposed transaction will not result in a loss or impairment of service for Aristotle's customers.²⁰ Applicants further state that "in assuming Aristotle's RDOF obligations any changes in the rates, terms, and conditions of service will be undertaken in the future pursuant to customers' contracts, tariffs, and applicable law."²¹ Applicants maintain that there are only minimal overlaps between locations Belzoni Cable serves where Aristotle is authorized for support.²² We agree with Applicants' contentions, and we find that the transaction will not result in any loss or impairment of service for either Applicant's subscribers and is not likely to have an adverse effect on competition.

We also find no harms associated with Universal Service Fund (USF) programs will arise from the Proposed Transaction. Applicants have voluntarily committed that Aristotle will "repay, as of the date that Belzoni is authorized for support for the Assigned Census Blocks if so authorized, a pro rata

Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to Assign Licenses to the Alaska Wireless Network, LLC, Memorandum Opinion and Order and Declaratory Ruling, 28 FCC Rcd 10433, 10442, para. 23 & n.71 (2013) (*Alaska Wireless-GCI Order*).

¹⁶ See, e.g., *CenturyLink-Level 3 Order*, 32 FCC Rcd at 9585, para. 9; *Verizon-Frontier Order*, 40 FCC Rcd at 3160, para. 9; *Verizon-Straight Path Order*, 33 FCC Rcd at 190, para. 5; *Alaska Wireless-GCI Order*, 28 FCC Rcd at 10442, para. 23.

¹⁷ See, e.g., *Applications of AT&T Inc. and DIRECTV for Consent to Assign or Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, 30 FCC Rcd 9131, 9141, para. 22 (2015) (*AT&T-DIRECTV Order*); *Applications of Comcast Corp., General Electric Co. and NBC Universal, Inc. for Consent to Assign Licenses and Transfer Control of Licenses*, Memorandum Opinion and Order, 26 FCC Rcd 4238, 4249, para. 25 (2011); *Application of EchoStar Communications Corp., (a Nevada Corp.), General Motors Corp., and Hughes Electronics Corp (Delaware Corps.) (Transferees) and EchoStar Communications Corp. (a Delaware Corp.) (Transferee)*, Hearing Designation Order, 17 FCC Rcd 20559, 20575, para. 27 (2002) (*EchoStar-DIRECTV HDO*); see also *Application of WorldCom, Inc. and MCI Commc 'ns Corp. for Transfer of Control of MCI Communications Corporation to WorldCom, Inc.*, Memorandum Opinion and Order, 13 FCC Rcd 18025, 18032, para. 10 (1998) (stating that the Commission may attach conditions to the transfers); *Applications of T-Mobile US, Inc., and Sprint Corp. for Consent to Transfer Control of Licenses and Authorizations; Applications of American H Block Wireless L.L.C., DBSD Corp., Gamma Acquisition L.L.C., and Manifest Wireless L.L.C. for Extension of Time*, WT Docket No. 18-197, ULS File Nos. 0008741236, 0008741420, 0008741603, and 0008741789 et al., Memorandum Opinion and Order, Declaratory Ruling, and Order of Proposed Modification, 34 FCC Rcd 10578, 10596, para. 42 (2019) (*T-Mobile-Sprint Order*); *Verizon-Frontier Order*, 40 FCC Rcd at 3160, para. 10.

¹⁸ 47 U.S.C. § 309(e); *CenturyLink-Level 3 Order*, 32 FCC Rcd at 9586, para. 10; *Verizon-Frontier Order*, 40 FCC Rcd at 3161, para. 11; *Verizon-Straight Path Order*, 33 FCC Rcd at 190-91, para. 7; *Alaska Wireless-GCI Order*, 28 FCC Rcd at 10442, para. 23.

¹⁹ See, e.g., *Alaska Wireless-GCI Order*, 28 FCC Rcd at 10443, para. 26; *Applications of AT&T Inc. and Centennial Communications Corp. for Consent to Transfer Control of Licenses, Authorizations, and Spectrum Leasing Arrangements*, Memorandum Opinion and Order, 24 FCC Rcd 13915, 13929, para. 30 (2009); *Verizon-Frontier Order*, 40 FCC Rcd at 3161, para. 11.

²⁰ Application at 2.

²¹ *Id.* at 6.

²² Supplement Letter at 4, Application at 10.

proportion of the RDOF support that it has received for locations in the Assigned Census Blocks (as defined in the Application) that are currently served by Belzoni”; and “as of the date that Belzoni is authorized for support for the Assigned Census Blocks, if so authorized, Belzoni hereby voluntarily commits to receive a reduction in the total authorized support, so that Belzoni will not receive support for the locations that it serves as of the date of the authorization.”²³ We accept Aristotle’s and Belzoni Cable’s commitments as firm and definite. Accordingly, we find that the transaction does not implicate the harms and inefficiencies associated with paying USF support for locations the counterparty or its affiliates already competitively serve.

Belzoni Cable further commits to meeting all public interest and performance obligations associated with the receipt of the transferred support,²⁴ and the record indicates that Belzoni Cable has the technical, financial, and managerial expertise to do so.²⁵ As evidence of Belzoni Cable’s capability to meet these obligations, Applicants state that Belzoni Cable “has certified deployment of voice and broadband service to approximately 73 percent of its RDOF locations to date and has certified that it has met its optional 20 percent milestone within two years.”²⁶ Applicants further state that “[u]pon consummating the [t]ransaction to include the Aristotle RDOF locations in the Assigned Census Blocks, and excluding any ongoing deployment in its own RDOF-supported areas, Belzoni Cable would already exceed the 40 percent deployment milestone in advance of the December 31, 2025 milestone.”²⁷ Additionally, Belzoni Cable “certifies and commits to meet the buildout and other RDOF obligations in the Assigned Census Block Group.”²⁸ Applicants note that Belzoni Cable is not taking on any debt in connection with the proposed transaction.²⁹ Overall, we conclude that the record in this proceeding does not support a finding of a public interest harm.

We next consider whether the proposed transaction is likely to generate verifiable, transaction-specific public interest benefits.³⁰ Applicants must provide evidence of a claimed benefit to allow the Commission to verify its likelihood and magnitude.³¹ Where potential harms appear unlikely, as is the case with the Application before us here, the Commission accepts a lesser degree of magnitude and

²³ Voluntary Commitment Letter at 1. Also, “[a]s part of this voluntary commitment, Belzoni will not be obligated to serve those locations. Belzoni will be obligated to serve all remaining locations in the Assigned Census Blocks and to serve any newly built locations in the Assigned Census Blocks upon reasonable request consistent with the terms of the RDOF program.” *Id.*

²⁴ Application at 8-9.

²⁵ *Id.* at 5, 7-10.

²⁶ *Id.* at 5.

²⁷ *Id.* Although RDOF support recipients are not required to submit the location data for purposes of meeting this milestone until March 2, 2026, the information reported in the National Broadband Map as of June 30, 2025, indicates that Belzoni currently serves enough locations in its SAC at the required speeds to exceed the 40% threshold, inclusive of the additional locations that will be added to its estimated obligation from the Assigned Census Blocks. National Broadband Map, <https://broadbandmap.fcc.gov/data-download/nationwide-data>. Certification of compliance with the 40% milestone is due March 2, 2026.

²⁸ Application at 10. Applicants state that “prior to closing the [t]ransaction, Aristotle will remain responsible for compliance with RDOF rules and reporting for the Assigned Census Blocks” and after closing “Belzoni Cable will be the entity against which the Commission will seek support recovery if it does not meet its buildout and performance requirements.” *Id.* at 9.

²⁹ *Id.* at 7.

³⁰ See *AT&T/DIRECTV Order*, 30 FCC Rcd at 9237, paras. 273-74; *CenturyLink-Level 3 Order*, 32 FCC Rcd at 9604, para. 50 (citing *AT&T Inc. and BellSouth Corporation Application for Transfer of Control*, WC Docket No. 06-74, 22 FCC Rcd 5662, 5761, para. 202 (2007)).

³¹ See *AT&T/DIRECTV Order*, 30 FCC Rcd at 9237-38, paras. 275-76; *CenturyLink-Level 3 Order*, 32 FCC Rcd at 9586, para. 10.

likelihood than when harms are present.³²

The Commission has specified that ensuring consumers receive new or additional services is an important public interest factor,³³ and accelerating private sector deployment of advanced services is one of the aims of the Act.³⁴ In light of the Applicants' commitments to meet all of Aristotle's federal high-cost support obligations³⁵ and the fact that Applicants are prepared to accelerate facilities-based service offerings,³⁶ we find it likely that the proposed transaction would result in some public interest benefits. Applicants state that "the efficiencies of deploying service in the Assigned Census Blocks in close proximity to Belzoni Cable's existing network and RDOF-supported locations, and Belzoni Cable's track record of exceeding RDOF milestones ... will enable increased investment and competition on an accelerated basis for telecommunications and broadband services in Issaquena and Sharkey counties."³⁷ Applicants assert that "Belzoni Cable has a strong track record of successfully executing organic expansion and meeting RDOF obligations in rural areas of Mississippi" and the transaction will "accelerate Belzoni Cable's ongoing efforts to expand broadband service to unserved areas."³⁸ We find that there will likely be efficiencies and increased investment that result from the proposed transaction and conclude that a grant is in the public interest. Because any potential harms are mitigated by the voluntary commitment discussed herein and considering that the proposed transaction is likely to yield some benefits, we find that the proposed transaction serves the public interest.

Conditional Authorization of RDOF Support

As stated above, we find that Belzoni Cable has sufficiently demonstrated its managerial, financial, and technological capabilities to meet its RDOF obligations and accordingly, we conditionally authorize Belzoni Cable to receive the RDOF support associated with the Assigned Census Block Group, conditioned upon its satisfaction of the following prerequisites within 90 days from the release date of this public notice: (1) submission and approval of an irrevocable letter of credit (LOC) from a qualifying bank securing the requisite amount of support for the Assigned Census Block Group;³⁹ (2) submission and approval of a supporting Bankruptcy Opinion Letter (Opinion Letter); and (3) submission of a Completion Notice that indicates that the transaction has been consummated, and the date thereof, and that Belzoni has satisfied all other prerequisites for authorization.⁴⁰

³² See *AT&T/DIRECTV Order*, 30 FCC Rcd at 9237-38, paras. 275-76; *CenturyLink-Level 3 Order*, 32 FCC Rcd at 9586, para. 10.

³³ See, e.g., *AT&T-DIRECTV Order*, 30 FCC Rcd at 9140, para. 19.

³⁴ See *Verizon-TracFone Order*, 36 FCC Rcd at 17001, para. 21 (citing 47 U.S.C. §§ 254, 332(c)(7), 1302; Telecommunications Act of 1996, Pub. L. No. 104-104, Preamble, 110 Stat. 56 (1996) (one purpose of the Act is to "accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services")).

³⁵ Application at 10.

³⁶ *Id.*

³⁷ *Id.*

³⁸ *Id.* at 8, 10.

³⁹ 47 CFR § 54.804(c).

⁴⁰ If Belzoni Cable fails to meet one or more conditions on its authorization as of this deadline, it must file notice of this failure on or before the 10th calendar day after this deadline in the Commission's Electronic Comment Filing System (ECFS) within the docket specified above. Belzoni Cable will automatically receive an additional 45 days to meet all conditions if, in this notification, it certifies that there have been no material changes relevant to, and as of, the grant of its conditional authorization and provides an estimated time frame for the completion of all unfulfilled conditions on the authorization. If circumstances warrant special consideration of the timing of the authorization (such as, inter alia, a pending default, upcoming milestone deadline, or an inability to certify no

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When submitting this information, Belzoni Cable must comply with the following procedures:

Letter of Credit and Opinion Letter. Belzoni Cable must submit a hard copy of the LOC and a hard copy of the Opinion Letter to the Universal Service Administrative Agency (USAC), at the following address: Universal Service Administrative Company, High Cost Program, Rural Digital Opportunity Fund LOC, Attn: Stephen Snowman and Kevin Case, 700 12th Street, NW, Suite 900, Washington, DC 20005, and electronic copies of the hard copies of the LOC and the Opinion Letter to USAC at hcinfo@usac.org and OGC-LOC@usac.org.

Completions Notice. Belzoni Cable must submit an electronic copy of the Completion Notice to USAC at hcinfo@usac.org and OGC-LOC@usac.org, and file an electronic copy in the Commission's Electronic Comment Filing System (ECFS) under WC Docket No. 25-127. Applicants should also email a copy of this notice directly to Dennis Johnson at dennis.johnson@fcc.gov and to Nissa Laughner at nissa.laughner@fcc.gov.

If and when all of these prerequisites are satisfied, the authorization of Belzoni Cable to receive the support associated with the Assigned Census Block Group will become effective. Until such authorization, Aristotle must maintain an irrevocable LOC securing the support for the Assigned Census Block Group and will retain sole responsibility for complying with the Universal Service Fund requirements for the Assigned Census Block Group. Once Belzoni Cable is authorized, all support and related transferrable assets associated with the Assigned Census Block Group, including any disbursements for the Assigned Census Block Group received by Aristotle pending the effective date of Belzoni Cable's authorization or thereafter, minus the amount the Applicants have committed to repay for the overlap locations, must be transferred to Belzoni Cable.⁴¹ If USAC cannot modify the payment system before one or more post-authorization payments associated with the Assigned Census Block Group comes due, Aristotle must, consistent with its obligation to transfer all support and assets associated with the Assigned Census Block Group, transfer the full amount of support it has received from USAC for the Assigned Census Block Group after Belzoni Cable's authorization.

We remind Belzoni Cable that once it satisfies all conditions of the RDOF authorization for the Assigned Census Block Group, it assumes sole responsibility for complying with universal service fund requirements and Commission rules, regardless of any preexisting or reasonably foreseeable conditions that could impact its ability to meet its obligations in the future, including technical, marketplace, and on-the-ground conditions.⁴² Indeed, any carrier seeking authorization to receive high cost support pursuant to a section 214 authorization must conduct the proper due diligence prior to consummation of the transaction and, in doing so, must assume all risks and consequences of noncompliance with program

material changes), this extension may not be granted, and the Bureau will notify Belzoni Cable of this fact and the reasons thereof by letter. If Belzoni Cable fails to meet its deadline (as extended, if applicable), the Bureau will reassess Belzoni Cable's continuing eligibility for authorization. It will notify Belzoni Cable by letter of the new terms of authorization, including, potentially, the imposition of additional conditions on authorization and the new deadline for meeting any outstanding conditions, or its determination that Belzoni Cable is ineligible for authorization. In the interest of expediting all pending authorizations, the Bureau makes clear that these changes apply to all pending authorizations associated with 214 transfers.

⁴¹ Once Belzoni Cable is authorized to receive the support, USAC will transfer all future support payments to Belzoni Cable as of the next month following the authorization or as soon as reasonably practicable thereafter. Unless parties to the transaction satisfy all conditions of authorization and give notice of such satisfaction in accordance with the above listed procedures on or before the 10th date of the month, it is unlikely that USAC will be able to transfer the next end-of-month payment to Belzoni Cable. We note that there may be extenuating circumstances other than this timing that might cause a temporary delay in the transfer of the payment.

⁴² See, e.g., *Authorization of Atlink Services, LLC to Receive Connect America Fund (CAF) Phase II Auction Support Transferred from Cherokee Telephone Company Pursuant to a Commission Approved Transaction*, WC Docket No. 10-90, Public Notice, 37 FCC Rcd 6158, 6159 (WCB 2022).

requirements, including default recovery of support and potential forfeiture penalties.⁴³ In addition, Belzoni Cable must meet all administrative, performance, and deployment obligations and deadlines,⁴⁴ including the requirement to deploy voice and broadband service meeting minimum standards to the requisite number of locations by specific service milestones.⁴⁵

Grant of Application

We find, upon consideration of the record, that the proposed transfer will serve the public interest, convenience, and necessity.⁴⁶

Therefore, pursuant to section 214 of the Act, 47 U.S.C. § 214, and sections 0.91, 0.291, and 63.04 of the Commission's rules, 47 CFR §§ 0.91, 0.291, and 63.04, the Bureau hereby grants the Application discussed in this Public Notice, subject to Applicants' compliance with all applicable obligations.

Pursuant to section 1.103 of the Commission's rules, 47 CFR § 1.103, the grant is effective upon release of this Public Notice. Petitions for reconsideration under section 1.106 or applications for review under section 1.115 of the Commission's rules, 47 CFR §§ 1.106, 1.115, may be filed within 30 days of the date of this Public Notice. For further information, please contact Dennis Johnson, Competition Policy Division, Wireline Competition Bureau, at (202) 418-1191; Nissa Laughner, Telecommunications Access Policy Division, at (202) 418-1358.

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⁴³ See *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 717-18, para. 68 (stressing that it is RDOF bidders' "sole responsibility" to complete due diligence by conducting adequate research and analysis before participating in the RDOF auction); *id.* at 725, para. 84 (requiring RDOF short-form applicants to certify that they are solely responsible for compliance with all RDOF requirements).

⁴⁴ The Bureau provides a summary of the various obligations of authorized RDOF support recipients in prior authorization public notices. As stated in these public notices, the summary is not intended to be comprehensive, and all authorized parties are responsible for conducting the due diligence required to comply with universal service fund requirements and the Commission's rules. See, e.g., *Rural Digital Opportunity Fund Support Authorized for 1,345 Winning Bids*, AU Docket No. 20-34, WC Docket Nos. 19-126 and 10-90, Public Notice, 37 FCC Rcd 4897, 4898-4905 (WCB 2022). We note that in addition to the requirements and rules specified in the public notices, RDOF support recipients must test and certify compliance with the relevant performance requirements in accordance with the uniform framework that has been adopted for measuring and reporting on high cost performance requirements. See *Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, AU Docket No. 20-34 et al., Public Notice, 35 FCC Rcd 6077, 6083, para.15 (2020); *Connect America Fund*, WC Docket No. 10-90, Order, 33 FCC Rcd 6509, 6530-33, paras. 56-67 (WCB 2018); *Connect America Fund*, WC Docket No. 10-90, Order on Reconsideration, 34 FCC Rcd 10109, 10110, para. 4 (2019) (expanding performance measure testing requirements); see generally *Connect America Fund*, WC Docket No. 10-90, Order, WC Docket No. 10-90, Order, 35 FCC Rcd 14658 (WCB 2020) (clarifying certain requirements).

⁴⁵ Specifically, RDOF support recipients must deploy service to an increasing percentage of authorized locations as of December 31st of each year beginning with a 40 percent milestone as of the third year of receiving support (for carriers authorized in 2022, the end of 2025), 60 percent as of the fourth year (2026), 80 percent as of the fifth year (2027), and 100 percent as of the sixth year (2028). 47 CFR § 54.802(c); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 709-12, paras. 45-55. The Commission will then adjust the initial defined deployment obligation assigned to each RDOF support recipient based on its determination of the number of locations within the supported area, without increasing or decreasing the authorized RDOF support, within a 35 percent margin of that support amount, consistent with RDOF requirements and rules. 47 CFR § 54.802(c); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 710-11, paras. 49-50.

⁴⁶ See 47 U.S.C. § 214(a); 47 CFR § 63.04.