

The Staff of the Missouri Public  
Service Commission,  
  
Complainant,  
  
v.  
  
American Broadband and  
Telecommunications Company  
d/b/a American Assistance  
  
Respondents

American Broadband and Telecommunications Company )  
d/b/a American Assistance )  
Respondents )

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response* in this matter hereby states:

<sup>1</sup> Docket No. LO-2019-0154.

2. In its *Answer* American Assistance attempts to transfer its burden to Staff of ensuring that its current Missouri Lifeline subscribers are transitioned to another eligible telecommunications carrier (ETC). Respondent also chooses the arbitrary date of May 1, 2020, to discontinue serving these subscribers and asks the Commission to order Staff to file a plan for the transition of those customers by another arbitrary date, April 17, 2020. This is unreasonable to the subscribers and will certainly cause harm to Missouri citizens, which by their very qualification for Lifeline service, could be among Missouri's more vulnerable citizens, especially in the current environment.

3. Federal Rule §54.205 includes a provision for instances when an ETC that serves a service area that has multiple ETCs providing service in that area, asks a state commission to rescind its ETC designation. The provision states that prior to permitting the ETC requesting to relinquish ETC designation the state commission should ensure that all universal service subscribers of that ETC will continue to be served. It also states that the state commission should permit the other ETCs serving the area(s) to construct additional infrastructure as necessary to serve those subscribers. Thereby Staff would suggest it is proper for the Commission to provide notice to the other ETCs serving the relevant service area(s) of American Assistance's request. Staff has included a list of the relevant ETCs attached to this pleading as Attachment A.

4. Staff would also ask that the Commission direct American Assistance to provide a written notice to its Missouri Lifeline subscribers that it will no longer be providing Lifeline services to Missouri citizens and that the customers will need to switch to another provider to continue receiving Lifeline service. The notice should direct them to the Lifeline Support website, [www.lifelinesupport.org](http://www.lifelinesupport.org), for information about other

Lifeline providers and the process to transition to a new provider. The notice should also clarify to them that if they do not switch to a new provider, they will no longer receive Lifeline services after the date which American Assistance's ETC designation is cancelled. The Commission order should include a requirement for the Company to provide a draft copy of the notice to Staff for Staff's approval and ensure subscribers receive notice by May 1, 2020. Staff would then recommend that the Commission not cancel the ETC designation prior to June 1, 2020, to permit customers at least 30 days to perform this transition.

**WHEREFORE**, Staff prays that the Commission will accept this *Response* and issue a notice to the relevant ETCs providing service in American Broadband and Telecommunications Company d/b/a American Assistance's service area(s); order American Assistance to provide notice to its customers no later than May 1, 2020, that it will cease to provide Lifeline services in Missouri; cancel the eligible telecommunications carrier designation of American Assistance no earlier than June 1, 2020; and grant such other and further relief as the Commission considers just in the circumstances.

**/s/ Whitney Payne**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9th day of April, 2020, to all counsel of record.

**/s/ Whitney Payne**

## **Missouri Wireless ETCs**

American Broadband and Telecommunications Company d/b/a American Assistance

American Wireless, Inc.

Assist Wireless, LLC

Boomerang Wireless, LLC d/b/a enTouch Wireless

Easy Telephone Service Co. d/b/a Easy Wireless

Global Connection Inc. of America d/b/a Stand Up Wireless

iwireless, LLC d/b/a Access Wireless

Missouri RSA No. 5 Partnership d/b/a Chariton Valley Wireless Services

Northwest Missouri Cellular Limited Partnership

Q-Link Wireless, LLC

Sage Telecom Communications, LLC d/b/a TruConnect

TAG Mobile, LLC

Telrite Corporation d/b/a Life Wireless

Tempo Telecom LLC d/b/a Tempo

TracFone Wireless, Inc. d/b/a SafeLink Wireless

USCOC of Greater Missouri, LLC d/b/a US Cellular

Virgin Mobile USA, L.P. d/b/a Assurance Wireless Brought to You by Virgin Mobile

YourTel America, Inc. d/b/a Missouri TerraCom