

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Mid-States     )  
Services, LLC for Designation as an Eligible     )     Case No. LO-2019-0093  
Telecommunications Carrier in the State of     )  
Missouri     )

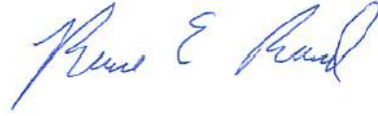
**AMENDED APPLICATION AND VERIFICATION OF MID-STATES SERVICES, LLC  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF MISSOURI**

On September 28, 2018 Mid-States Services, LLC (“Mid-States”), by its undersigned counsel submitted its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri (“Application”). The Application inadvertently included a reference to wireless ETC authority t. The remainder of the document talked in terms of wireline connectivity however and Mid-States is requesting wireline ETC authority. Attached is a corrected Amended Application and verification.

Mid-States requests that it be expeditiously granted wireline ETC authority to enable it to receive the CAF II reverse auction funds it has been allocated.

Respectfully submitted,

MID-STATES SERVICES, LLC



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Bruce E. Beard  
Cinnamon Mueller  
1714 Deer Tracks Trail  
Suite 230  
St. Louis, MO 63131  
(314) 394-1535

*Its Counsel*

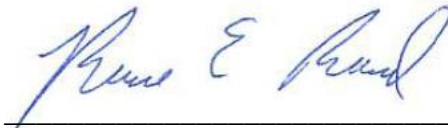
Dated: October 1, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 1<sup>st</sup> day of October 2018, to the following parties:

General Counsel  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102

Office of Public Counsel  
Governor Office Bldg., Suite 650  
PO Box 2230  
Jefferson City, MO 65102



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Bruce E. Beard  
Cinnamon Mueller

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**APPLICATION AND VERIFICATION OF MID-STATES SERVICES, LLC  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF MISSOURI**

**I. INTRODUCTION**

Mid-States Services, LLC (“Mid-States” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”)<sup>2</sup>, and the rules and regulations of the Missouri Public Service Commission (“Commission”), including 4 CSR 240.31.130, hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri.

On August 28, 2018, the FCC announced the successful bidders in its Connect America Fund (“CAF”) Phase II reverse auction. The CAF program is part of the FCC’s reform and modernization of its universal service support programs to accelerate broadband build-out to those who lack access to infrastructure capable of providing at least 10/1 Mbps fixed broadband.<sup>3</sup>

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101 – 54.207.

<sup>3</sup> See *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC

Mid-States participated in the reverse auction designed to provide broadband in such areas in the most cost-efficient manner. Mid-States was allocated \$1,868,060 over a ten-year period to help offset the cost of deploying fiber for broadband connections to approximately 358 locations in its service area.<sup>4</sup> Mid-States requests the ETC designation to receive the CAF II funds allocated to it through the reverse auction.

As demonstrated herein, Mid-States meets all the statutory and regulatory requirements for designation as an ETC in the State of Missouri. Rapid grant of Mid-States' request will advance the public interest by fulfilling the goals of the FCC's CAF II program of deploying voice and broadband networks in areas where access to broadband at adequate speeds is lacking. Other companies simply were not providing the level of broadband the FCC felt was necessary to achieve its statutory obligations regarding universal service. As proven by the reverse auction process, Mid-States is in the best position to achieve that goal for the FCC designated census block areas in a cost-efficient fashion using USF funds

The FCC CAF II auction requirements did not require a bidder to be an ETC to participate in the auction. In addition, bidders were prohibited from disclosing publicly that they were participating in the reverse auction. Thus, Mid-States delayed filing for ETC designation until the FCC announced that Mid-States was a winning bidder. The CAF II requirements provide that a winning bidder must certify within 180 days of the release of the Public Notice closing the auction that it has ETC designation. Accordingly, Mid-States respectfully requests that the Commission expeditiously approve this application for ETC designation.

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Rcd 17663 (2011); *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order et al, (June 10, 2014); *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order (Dec. 18, 2014).

<sup>4</sup> See DA 18-887 (Aug. 28, 2018).

All correspondence, communication, pleadings, notices, orders, and decisions relating to this Application should be addresses to:

Bruce E. Beard  
Cinnamon Mueller  
*Attorney for Mid-States Services, LLC*  
1714 Deer Tracks Trail  
Suite 230  
St. Louis, MO 63131  
Phone: (314) 394-1535  
Fax: (314) 394-1538  
Email: [BBeard@CinnamonMueller.com](mailto:BBeard@CinnamonMueller.com)

## **II. MID-STATES' SERVICE OFFERING**

Mid-States is a Missouri limited liability company. Its principal office is located at 4100 Oklahoma Ave. Trenton, MO 64683. Mid-States Services, LLC is an affiliate of Grundy Electric Cooperative, Inc. Mid-States provides wireline Internet, fiber broadband Internet access service (“BIAS”) and interconnected voice over IP (“VoIP”) services in rural Missouri. Mid-States currently provides symmetrical Internet speeds of 50 mbps, with speeds available up to 250 mbps..

By utilizing the funds awarded through the CAF II program, along with its own funds, Mid-States will expand the availability of such services to many more consumers including those who are otherwise unable to receive it or previously ignored by traditional carriers, which is the principal reason that Congress created the universal service program and the FCC enacted the CAF program.

## **III. REQUIREMENTS FOR DESIGNATION AS AN ETC**

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to



designate ETC status for federal universal service purposes and authorizes the Commission to designate wireline ETCs.<sup>5</sup> Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier's services.<sup>6</sup> Applicants also must commit to advertise the availability and rates of such services.<sup>7</sup> The requirements are codified by the Commission in 4 CSR 240-31.130.

Pursuant to 4 CSR 240.130.1(B) all applications for ETC designation are to include the following summarized information<sup>8</sup>:

1. Description of service applicant will offer;
2. Identification of the applicant's proposed service area;
3. Explanation of how applicant will offer services using own facilities or combination of its own facilities or resale;
4. Statement certifying that applicant will advertise availability of service and its price, using media of general distribution;
5. Certification that applicant will comply with applicable Federal service requirements;
6. Demonstration of the applicant's ability to remain functional in emergency situations, including description of back-up power and manage emergency situations;
7. Statement that applicant will satisfy applicable consumer protection, consumer privacy, and service quality standards.

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<sup>5</sup> Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, at 8858-59 ¶ 145.

<sup>6</sup> See 47 U.S.C. 214(e)(1)(A).

<sup>7</sup> See 47 U.S.C. 214(e)(1)(B).

<sup>8</sup> See 4 CSR 240.130.1

8. Description of rates, terms and conditions of proposed voice telephony service to be supported as Lifeline or Disabled services;
9. Explanation of how applicant intends to provide service through the proposed service area, including areas where the applicant lacks facilities or network facilities;
10. Description of how applicant will ensure service will be provided in timely manner to requesting customers;
11. Commitment to remit required 911 revenues;
12. Demonstration that applicant is financially viable and technically capable of providing voice telephony service;
13. Description of how, if at all, applicant will provide access to directory assistance, operator services and interexchange services;
14. Disciplinary history, if any, of applicant or individuals associated with the applicant;
15. Elements for participation in Lifeline or Disability program;
16. Certifications of Compliance;
17. Federal High Cost-Support Compliance.

**IV. MID-STATES SATISFIES THE APPLICABLE REQUIREMENTS FOR DESIGNATION AS AN ETC**

**1. Description of service.**

Mid-States offers, and will offer, upon designation as an ETC in Missouri, all the services and functionalities required by 4 CSR 240-31.130 - and Section 45.101(a)(1)-(9) and Section 54.202(a) of the FCC's Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. §542.02(a)). Mid-States currently offers fiber Internet access service and interconnected VoIP service to its subscribers. Mid-States is registered as an interconnected VoIP provider in the state of Missouri (see, DA-2018-0163) and an CLEC/IXC provider (see, LA-2019-0083). All Internet services

meet the FCC definition of Broadband (i.e. 25 mbps download/3 mbps upload). Mid-States will use the CAF II funding to provide symmetrical speeds of 50 mbps, with speeds available up to 250 mbps. Such speeds will be offered throughout the census blocks being built out using the CAF II funding. Mid-States will also offer local exchange service via interconnected VoIP throughout the census blocks.

**2. Mid-States Requests Designation In its Proposed CAF II Service Area in Missouri.**

The FCC adopted a census block methodology for designating a service area for the CAF II reverse auction. Mid-States requests ETC designation for a service area that includes the census block areas of Missouri on the attached Exhibit 1, which identifies the census blocks for which funds were allocated through the CAF II reverse auction process.

**3. Mid-States will offer services using its own facilities or combination of its own facilities or resale.**

Mid-States will use its own facilities to extend fiber and build out the census blocks allocated through the CAF II reverse auction. The broadband Internet access service and interconnected VoIP services will be provided over fiber facilities owned by Mid-States. Mid-States has been offering interconnected VoIP telephone service pursuant to its Commission authorization granted on January 11, 2018. Mid-States' interconnected VoIP service provides its consumers with the communications equivalent of traditional wireline local and intrastate long-distance services for connections to and from the public switched network. This includes essential functions such as access to emergency 911 service, operator services and directory assistance. Subscribers can make and receive calls in essentially the same manner as traditional wireline service and have access to common features such as call waiting, call forwarding, 3 way

calling, caller ID and voicemail. Mid-States utilizes the services of an underlying wholesale provider for access to the public switched network and numbering resources.

**4. Mid-States will advertise availability of service and its price, using media of general distribution.**

Mid-States will advertise the availability of the supported services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services. Mid-States agrees to comply with all form and content requirements, if any, promulgated by the FCC and the Commission in the future as required of all designated ETCs.

Mid-States advertises its services using many platforms, including newspapers, direct mailings, radio ads, information on Mid-States website, press releases, and digital marketing campaigns. An example is attached as Exhibit 2.

**5. Mid-States will comply with applicable Federal service requirements.**

Mid-States will comply with all applicable Federal service requirements associated with accepting the funds awarded. The FCC has adopted a waiver of general requirements related to a “network improvement and maintenance plan” (4 CSR 240-31.130.1(F)) and such requirements should be waived consistent with the FCC’s waiver of the five-year improvement plan. As a recipient of CAF II funds through the reverse auction, Mid-States must meet the build out requirements of the program and provide annual reports regarding its build out requirements to the Universal Service Administration Corporation which administers the federal universal service fund. Specifically, Mid-States must offer commercially at least one voice and one broadband service meeting the relevant service requirements to the required number of locations in the following timeframe:

- 40% of the required number of locations in a state by the end of third year of support
- An additional 20% in each subsequent year
- 100% by the end of the sixth year of support

Accordingly, the FCC eliminated, for all CAF recipients, the annual reporting obligations associated with both the five-year improvement plan and the consumer protection certification, after determining that such obligations were no longer essential to the Commission’s ability to monitor ETC use of support for its intended purpose.<sup>9</sup> On July 10, 2018 the FCC announced that: “Consistent with these decisions, we find good cause to waive, on our own motion, the requirement that winning bidders [of the CAF II reverse auction] seeking an FCC ETC designation file a five-year improvement plan and demonstrate that it will satisfy applicable consumer protection and service quality standards.<sup>10</sup> We do so for the same reasons the Commission eliminated them from the annual reporting requirements.<sup>11</sup>” Thus, the FCC has adopted a waiver of general requirements related to a “network improvement and maintenance

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<sup>9</sup> See *Connect America Fund et al., ETCs Annual Reports and Certifications*, WC Docket Nos. 10-90, 14-58, Report and Order, 32 FCC Rcd 5944, 5944-48, paras. 3-14 (2017) (*ETC Reporting Streamlining Order*) (eliminating requirements relating to the reporting of network outages, unfulfilled service requests, complaints, and pricing and the certification of compliance with applicable service quality standards).

<sup>10</sup> Generally, the Commission’s rules may be waived if good cause is shown. 47 CFR § 1.3. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest. *Ne. Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990). In addition, the Commission may consider issues of hardship, equity, or more effective implementation of overall policy on an individual basis. *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Ne. Cellular*, 897 F.2d at 1166. Waiver of the Commission’s rules is appropriate only if both (i) special circumstances warrant a deviation from the general rule, and (ii) such deviation will serve the public interest. *NetworkIP, LLC v. FCC*, 548 F.3d 116, 125-128 (D.C. Cir. 2008); *Ne. Cellular*, 897 F.2d at 1166.

<sup>11</sup> See, e.g., *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order, Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 31 FCC Rcd 3087, 3168, para. 216 (2016) (explaining that the detailed broadband buildout obligations of rate-of-return ETCs provide a “more defined yardstick by which to measure their progress towards the universal availability of voice and broadband service in their areas,” and thus, obviate the need for a five-year plan and annual updates); *ETC Reporting Streamlining Order*, 32 FCC Rcd at 4944, para. 1 (eliminating several ETC rules as either duplicative of other reporting requirements or simply no longer necessary given other methods of overseeing use of USF support).

plan” (4 CSR 240-31.130.1(F)) and such requirements should be waived consistent with the FCC’s waiver of the five-year improvement plan.<sup>12</sup>

**6. Mid-States’ ability to remain functional in emergency situations.**

Mid-States is able to remain functional in an emergency situation through the use of back-up power to ensure functionality without an external power source. Mid-States’ standard for battery backup is 4 hours in offices with a generator. This is ensured during annual routine maintenance which includes battery inspection, cleaning, documentation of float voltage and cell temperature, as well as equalization or replacement if necessary. Also, portable generators are available for deployment to remote hubs without permanent generators. Mid-States’ network is engineered to provide maximum capacity in order to handle excess traffic in the event of traffic spikes resulting from emergency situations. Mid-States’ facilities are remotely monitored and managed by a centralized Network Operations Center which is staffed 24 x 7, 365 days a year. Technicians are able to remotely access and respond to alarm conditions. By design, transport redundancy is built into the telephony and data network on many levels and in the event of a hardware or circuit failure or traffic spike, the networks are able to self-correct in many cases or, at many locations, technicians are able to manually switch network elements to standby facilities both locally and remotely.

**7. Mid-States will satisfy applicable consumer protection, consumer privacy, and service quality standards.**

Mid-States will satisfy all consumer protection and service quality standards as provided in 47 C.F.R § 54.202(a)(3), and all applicable state specific consumer protection and service

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<sup>12</sup> *WCB Reminds Connect America Fund Phase II Auction Applicants of The Process for Obtaining A Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197, 10-90, Public Notice, DA 18-714 (rel. July 10, 2018).

quality standards. Mid-States follows applicable federal and state service quality and consumer protection rules. As previously noted, the FCC waived the requirement that the winning bidders in the CAF II reverse auction seeking FCC ETC designation certify annually that it will satisfy applicable consumer protection standards and quality standards.<sup>13</sup>

Mid-States nonetheless provides the following to demonstrate its concern for consumer protection and service quality standards. Mid-States complies with quality of service requirements including monitoring and reporting service quality metrics where required. Mid-States has implemented numerous consumer protection measures to protect customer information. For example, Mid-States implemented Customer Proprietary Network Information (“CPNI”) policies and procedures that are consistent with the FCC’s regulations. Employees are required to complete CPNI training and in addition, employees who have access to CPNI data receive additional guidance through written procedures regarding customer authentication. Annually, all employees are required to review Mid-States’ Business Code of Conduct which includes information and requirements on protecting sensitive customer information from improper use and disclosure. Mid-States’ privacy and security policies are reinforced through periodic training required of all employees. Additional consumer protection measures include Mid-States’ use of a third –party verifier to prevent unauthorized presubscribed interexchange carrier (PIC) changes (“Slamming”) and the fact that there are no billing and collection arrangements that could have potentially allowed unauthorized third-party charges to be added to customer’s bills (“Cramming”).

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<sup>13</sup> See Section 5 above and *WCB Reminds Connect America Fund Phase II Auction Applicants of The Process for Obtaining A Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197, 10-90, Public Notice, DA 18-714 (rel. July 10, 2018).

**8. Description of rates, terms and conditions of proposed voice telephony service to be supported as Lifeline or Disabled services.**

Mid-States is not seeking ETC designation to participate in the Lifeline or Disabled programs. If a decision to participate in the Lifeline or Disabled programs is made, Mid-States will seek amended ETC approval.

**9. Explanation of how Mid-States intends to provide service through the proposed service area, including areas where the applicant lacks facilities or network facilities.**

Mid-States currently offers broadband Internet access service and interconnected VoIP service throughout its built out service area today. Mid-States will use the allocated CAF II reverse auction funds allocated to it, along with its own funds, to build out the awarded census blocks.

**10. Mid-States will ensure service will be provided in timely manner to requesting customers.**

Mid-States has been providing broadband Internet access service to subscribers in its service area since 1999 and has a long, established history of providing service in a timely manner. In addition, as described above, the receipt of the CAF II funds includes a stringent build-out timeline with annual reporting to the Universal Service Administration Corporation.

**11. Commitment to remit required 911 revenues.**

Mid-States commits to remit all required 911 revenues.



**12. Mid-States is financially viable and technically capable of providing voice telephony service.**

Mid-States is financially viable and technically capable of providing the interconnected VoIP voice telephony service. Mid-States has been offering interconnected VoIP telephone service pursuant to its Commission authorization granted on January 11, 2018. It has been offering broadband Internet access service since 1999. Mid-States is an affiliate of Grundy Electric Cooperative, Inc. which has been providing electrical service since its inception in 1938, 80 years ago. Mid-States is financially and technically capable of providing the services.

**13. Description of how Mid-States will provide access to directory assistance, operator services and interexchange services.**

Directory assistance, operator services and interexchange services are provided via a combination of Mid-States network and commercial wholesale agreements.

**14. Disciplinary history, if any, of applicant or individuals associated with the applicant.**

Mid-States is an affiliate of Grundy Electric Cooperative, Inc, which is member owned. Neither Mid-States nor individuals associated with Mid-States have a history of any disciplinary action.

**15. Elements for participation in Lifeline or Disability program.**

Not applicable. Mid-States is not seeking ETC designation to participate in the Lifeline or Disabled programs. If a decision is made to participate in the Lifeline or Disabled programs, Mid-States will seek amended ETC approval.

## **16. Certifications of Compliance.**

Consistent with Section 240-31.130.1(E) of the Commission's rules Mid-States certifies that it will notify the Commission of any change in company information, will comply with all reporting and assessment obligations and will comply with all FCC and Commission rules. Mid-States is authorized by the Commission to provide interconnected VoIP telephony service<sup>14</sup> and CLEC/IXC services<sup>15</sup> and certifies to comply with all requirements regarding to such authority.

## **17. FCC High Cost Compliance.**

Section 240-31.130.1(F) of the Commission rules require certain information from those seeking ETC designation for the intended purposes of receiving federal high cost support “excluding applications for designation solely for the purpose of deploying or operating services pursuant to either the Connect America Fund or the CAF Mobility Fund established by the FCC's Connect America Fund Order, 26 FCC Rcd. 17663 (2011).” As noted, Mid-States is seeking ETC authority solely to receive the funds allocated to it by the federal high cost support fund through successful completion of the CAF II reverse auction. Thus, the additional information is not required based on the express terms of the Commission rules.

## **V. DESIGNATION OF MID-STATES AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST**

The designation of Mid-States as an ETC will serve the public interest by facilitating the goals of the FCC's CAF II program by deploying voice and broadband networks in areas where access to broadband at adequate speeds is lacking. Under the 1996 Federal Communications Act, “upon request and consistent with the public interest, convenience and necessity” the state commission shall “designate more than one common carrier as an eligible telecommunications

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<sup>14</sup> See, DA-2018-0163.

<sup>15</sup> LA-2019-0083

carrier for a service area designated” by the state commission.<sup>16</sup> Before such a designation, the state commission shall find that the designation is in the public interest.<sup>17</sup> In its 2005 ETC Order, the FCC determined that the benefits of increased consumer choice, and the unique advantages of the applicant’s service offering are components of a public interest analysis.<sup>18</sup> In addition, the purpose of the Connect America Fund was to expand broadband to rural America. Other companies simply were not providing the level of broadband the FCC felt was necessary to achieve its statutory obligations regarding universal service. As proven by the reverse auction process, Mid-States is in the best position to achieve that goal for these census blocks in a cost-efficient fashion using USF funds.

Expedited designation of Mid-States will serve the public interest by ensuring that the Mid-States is eligible to receive the federal USF support allocated to Mid-States by through the CAF II reverse auction. Mid-States will use this funding to directly advance the FCC's goal of deploying and expanding access to high-speed, high-quality broadband and voice provided through interconnected VoIP to residents of rural Missouri. These advanced communications services will provide important high-speed connectivity to the Internet for citizens of rural Missouri allowing for the myriad of opportunities the high-speed connectivity can provide.

Designation of Mid-States as an ETC is also in the public interest because it will promote increased competitive choice, increasing innovation and incenting other carriers to improve their existing networks to remain competitive. This will cause greater access to high-speed broadband and voice services, and improved service quality for residents of underserved communities in rural Missouri

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<sup>16</sup> 47 C.F.R. 54.201(c).

<sup>17</sup> *Id.*

<sup>18</sup> *In the Matter of Federal-State Joint Board on Universal Service, Report and Order*, CC Docket No. 96-45, FCC 05-46, 20 *FCC Rcd* 6371, 6389 (rel. Mar. 15, 2005) (“2005 ETC Order”).

Grundy Electric Cooperative, Inc. has invested significant resources in rural Missouri to provide consumers with quality electric service since 1938 and more recently, through Mid-States, investing in upgrading and using its resources to provide broadband Internet service and interconnected VoIP phone service in the rural areas it serves. Mid-States is well positioned to efficiently use federal CAF funding to expand its communications infrastructure and service offerings to rural Missouri lacking the requisite broadband speeds thus fulfilling the public interest goals of the FCC's CAF II fund.

## **VI. CONCLUSION**

Based on the evidence presented herein, Mid-States requests that it be expeditiously granted ETC authority to enable it to receive the CAF II reverse auction funds it has been allocated.

Respectfully submitted,

MID-STATES SERVICES, LLC

A handwritten signature in blue ink, appearing to read "Bruce E. Beard".

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Bruce E. Beard  
Cinnamon Mueller  
1714 Deer Tracks Trail  
Suite 230  
St. Louis, MO 63131  
(314) 394-1535


*Its Counsel*

Dated: October 1, 2018

## AFFIDAVIT & VERIFICATION

I, Troy Slagle, a natural person, do hereby swear and affirm that I am an officer of Applicant and that the following information and statements are true and correct to the best of my knowledge and belief:

1. I am an authorized representative of Mid-States Services, L.L.C. and acknowledge that I have the authority to execute this Affidavit and Verification on behalf of Mid-States Services, L.L.C. and have read the foregoing Application and certify that the foregoing Application is based upon information which is true and correct to the best of my knowledge.
2. Mid-States Services, L.L.C. certifies that it is a common carrier under §§214(e)(1)-(2) of the Communications Act as amended (the "Act").
3. Mid-States Services, L.L.C. commits to provide the services and functionalities required for designation as a wireline Eligible Telecommunications Carrier ("ETC") in the census blocks wherein funds are being allocated to Mid-States Services, L.L.C. through the Connect America Fund ("CAF") Phase II reverse auction.
4. Mid-States Services, L.L.C. certifies that it will meet all of the applicable FCC requirements for designation as an ETC under the §214(e) of the Act and all applicable Commission requirement's for designation as an ETC.
5. I am the corporate officer responsible for certifying Mid-States Services, L.L.C.'s use of federal high cost support. Mid-States Services, L.L.C is eligible to be designated as an ETC within the meaning of §214(e) of the Act, and is eligible to receive universal support funding pursuant to §254(c) of the Act.
6. Mid-States Services, L.L.C will use the federal high-cost support funds that it receives only to provide, deploy, upgrade and/or maintain facilities and services for which the support is intended.

  
\_\_\_\_\_  
Troy A. Slagle  
IT Manager

State of Missouri  
County of Grundy

Subscribed and sworn before me this 1 day of October 2018.



**SANDRA J. BROWNING**  
My Commission Expires  
February 2, 2022  
Grundy County  
Commission #14463978

  
\_\_\_\_\_  
Notary Public

Notary Seal:

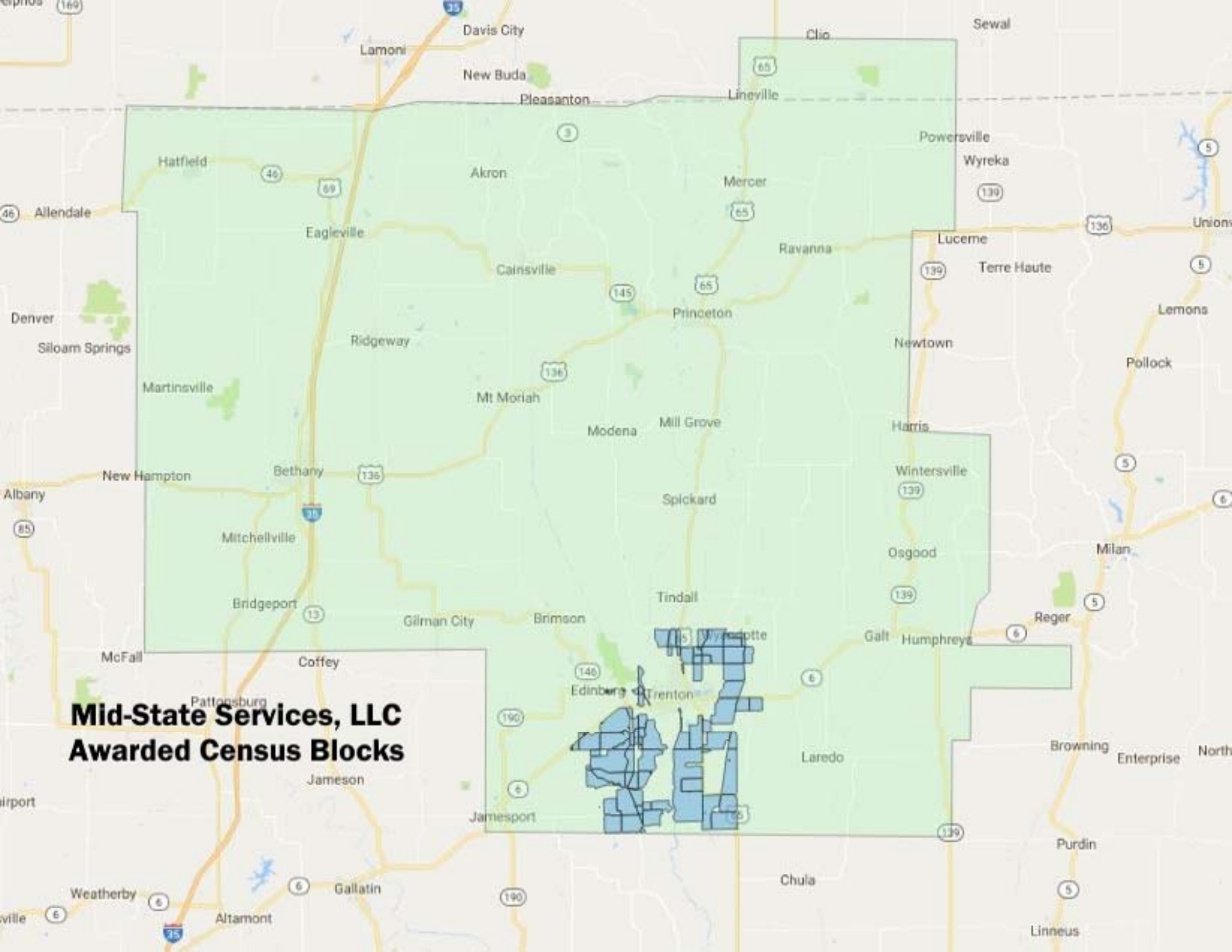
## Exhibit 1

### Mid-States' CAF II Census Block Service Areas and Designated Service Area



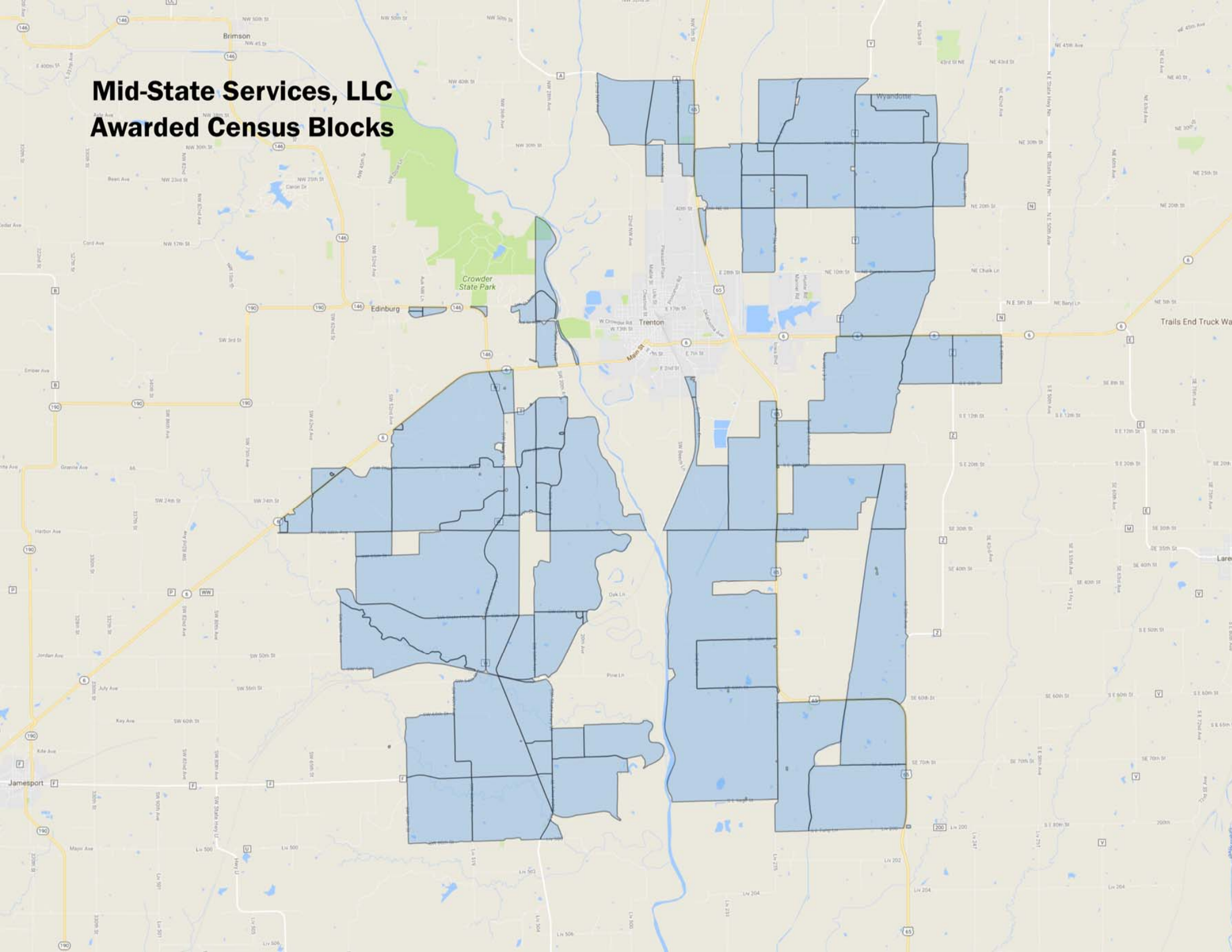


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903 Mid-States Services, LLC	18511303	290799602002336	MO-079-9602002	MO	Grundy	290799602002



**Mid-State Services, LLC  
Awarded Census Blocks**

# Mid-State Services, LLC Awarded Census Blocks



## Exhibit 2

### Mid-States' Advertisement Example

# Fiber Internet Built for Your Home!



Need faster internet service for your favorite streaming entertainment?  
Mid-States Services is now offering three Fiber Broadband Internet packages for your home:

- 50Mbps Download a 4-minute song in 2-3 seconds!
- 100Mbps Download a 5-minute video in 2-3 seconds!
- 250Mbps Download a 2-hour movie in 45 seconds!

Also available Voice Over Internet Services  
Ask about our \$5.00 bundle discount!

**Call Us Today!**  
**660-359-2045**

**Our qualified staff will help you connect faster.**



<https://midstatesfiber.net>



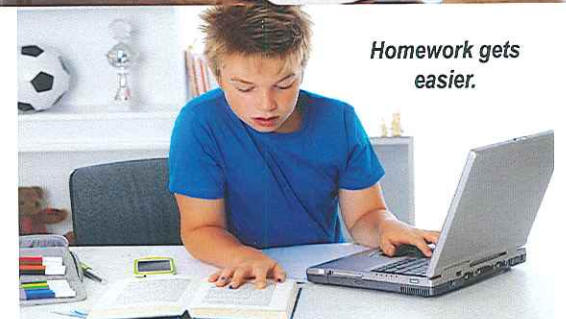
2626 Oklahoma Avenue  
Trenton, Missouri 64683  
660-359-2045  
<https://midstatesfiber.net>

## STORE HOURS:

Monday - Friday 8:00 AM - 5:00 PM  
Saturday 9:00 AM - 12:00 PM

# Mid-States Services

<https://midstatesfiber.net>



## What is Broadband Fiber Internet?

The term broadband commonly refers to high-speed internet access that is always on and faster than the traditional internet access.

Broadband includes several high-speed transmission technologies.

Mid-States Services is offering broadband Internet services over a fiber network.

## Is the Broadband Service available for my business?

**YES!**

Service for businesses will also be available at 50, 100, and 250 Mbps speeds.

Now you will be able to communicate with the world faster and more effectively!

## Where is this service available?

Mid-States Services Fiber Broadband Internet project is located within the city limits of Trenton, Missouri.



## How much will this service cost?

50 Mbps	\$49.95/month
100 Mbps	\$59.95/month
250 Mbps	\$79.95/month
VOIP	\$29.95/month
Bundle Discount	\$5.00/month



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*"Faster internet speeds will help your children learn, your business to thrive, and allow you to relax with your favorite streaming services!"*