

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

In the Matter of an Investigatory Docket)
to Review the Lifeline Program Practices of)
American Broadband and Telecommunications)
Company d/b/a American Assistance)

File No. LO-2019-XXXX

MOTION TO OPEN AN INVESTIGATORY DOCKET

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its *Motion to Open an Investigatory Docket* in this matter states as follows:

1. The Commission granted American Broadband and Telecommunications Company d/b/a American Assistance (American) status as an eligible telecommunications carrier (ETC) in July 2014 in Case No. RA-2014-0225. On October 23, 2018, the Federal Communications Commission (FCC) issued a Notice of Apparent Liability for Forfeiture (NAL) against American, alleging that American had committed repeated, systematic and large-scale violations of FCC rules governing the Lifeline Program. American will be given an opportunity to respond to the NAL, but to date the FCC has not reported that American has filed a response.

2. Staff asks that the Commission open an investigatory docket and permit it to issue data requests pertinent to this subject so that Staff may discern if American has violated any Missouri statutes, Commission rules, federal statutes or federal rules applicable to its Lifeline service in Missouri. Should Staff discover that American has violated any applicable Missouri or federal statutes or rules, it will proceed as appropriate.

WHEREFORE, Staff prays that the Commission will issue an order that opens an investigatory docket into this matter; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/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 21st day of November, 2018, to all counsel of record.

/s/ Whitney Payne