

**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)

**SUPPLEMENTAL INFORMATION NO. 2 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”). On October 1, 2018, Mid-States submitted an amendment to the Application, clarifying that Mid-States is seeking *wireline* ETC authority. On October 10, 2018, Mid-States received an email from the Missouri Public Service Commission with request for clarification or additional information to be provided. On October 12, 2018, Mid-States submitted Supplemental Information and Verification which responded to all the items raised in the October 10th email. On October 16, 2018, Mid-States received an additional email from the Commission requesting information related to Lifeline service obligations. We respond to staff’s request below and attach the Supplemental Verification. Staff’s requests are bolded followed by our response.

4 CSR 240-31.130(1)(B)8: A description about the rates, terms, conditions of the supported services. Indicate how such information will be maintained. If such

information will be maintained on a publicly available website then provide the website address.

Attached as **Exhibit A** are Mid-States' Internet rates as of October 16, 2018. Mid-States certifies that it will advertise its Lifeline rates, as a discount from its interconnected VoIP rates on the website. Instructions for applying for the Lifeline service will also be included on the website along with the number to call for any questions subscribers might have regarding their eligibility, the forms to be completed or the service itself. The information contained in Exhibit A and other information regarding the terms and conditions of Internet service and voice service, including the availability of Lifeline service as described above, will be maintained at <http://www.mid-states.net>.

4 CSR 240-31.130(1)(D): All ETC applications shall contain the following information and commitments regarding the applicant's proposed participation in the Lifeline or Disabled program:

- **Certify funding will flow through to the subscriber.**

Mid-States certifies that funding will flow through to the subscriber.

- **Commit to solely conduct business under name granted for ETC status. This commitment should include a statement the company will not use additional service or brand names.**

Mid-States commits to solely conduct business under name granted for ETC status and will not use additional service of brand names.

- **Commit to comply with all FCC Lifeline program rules (47 CFR Part 54 Subpart E).**

Mid-States commits to comply with all FCC Lifeline program rules as laid out in 47 CFR Part 54 Subpart E.

- **Commit to comply with all MoPSC Lifeline program requirements whether funded solely through the FUSF or through the FUSF and the Missouri Universal Service Fund (MoUSF).**

Mid-States commits to comply with all MoPSC Lifeline program requirements whether funded solely through the FUSF or through the FUSF and the Missouri Universal Service Fund (MoUSF).

- **Demonstrate how applicant will ensure funding will flow thru to subscriber.**

The USF CAF II reverse auction allocation will allow Mid-States to build the infrastructure and provide Internet services to communities in rural areas that are currently financially uneconomical to build, hence their inclusion in the CAFII auction process. As the winning bidder in the CAFII reverse auction, Mid-States demonstrated that it was in the best position to build out the area in the most economical fashion for the USF. The CAFII reverse auction allocation and the requirements and standards associated therewith assures that the funding will flow through to the subscriber. In addition, the provision of Lifeline service will also ensure that the funding will flow through to the subscriber. Mid-States will issue a monthly credit to all eligible Lifeline customer's invoices reflective of the support designated in 47 CFR 54.403.

- **A statement indicating whether the applicant intends to seek support from the MoUSF. If so, state whether the company intends to participate in the Disabled program.**

At this time, Mid-States does not intend to seek support from MoUSF.

- **Copy of Disabled program enrollment form, if will be participating in that program.**

N/A.

- **Explain how company will initiate Lifeline service to the subscriber including: How the company will ensure a subscriber meets eligibility requirements, determine if a subscriber's identity and primary address are correct and how the company will ensure that only one (1) Lifeline or Disabled discount is received per household.**

Mid-States Services, LLC will require subscribers complete the FCC Form 5629 (application and certification form), along with the acceptable program eligibility documentation. Additionally, Mid-States Services, LLC. will utilize the National Lifeline Accountability Database ("NLAD") to check on a real-time basis whether a consumer is already receiving a Lifeline Program-supported service. Mid-States Services, LLC. will transition to the Lifeline National Verifier system when it is launched in Missouri.

- **If the company does not charge a monthly fee for Lifeline service, explain how it will comply with FCC requirements that the company will not receive universal service support until the subscriber activates the service and de-enrollment for non-usage as provided in 47 CFR 54.405(e)(3).**

Mid-States Services, LLC. will implement a non-usage policy whereby we will identify Lifeline customers whom have not used the Company's Lifeline service for 60 days. If no usage appears on an activated Lifeline customer's

account during any continuous 30-day period, Mid-States Services, LLC. will promptly notify the customer that the customer is no longer eligible for Mid-States Services, LLC's Lifeline service subject to a 30 day grace period. During the 30-day grace period, Mid-States Services, LLC. will attempt to reach the customer to determine whether the customer desires to remain on the Company's Lifeline service. If the customer's account does not show any customer-specific activity during the 30-day grace period, Mid-States Services, LLC. will deactivate Lifeline services, unless the customer affirmatively responds confirming that the customer wants to continue receiving Lifeline.

- **Explain how company will comply with annual verification process, including what action will be taken if a subscriber fails to adequately respond or is no longer eligible for support.**

Mid-States Services, LLC. will elect to have the Universal Service Administrative Co. ("USAC") conduct the rolling recertification process on our behalf. USAC's process will comply with the Lifeline recertification rules.

- **Indicate whether agents or independent contractors will be used to enroll subscribers. If non-employees are going to be used include a statement committing to take responsibility for them and their activities as if they were legally employees of the company. In addition, explain how it will monitor such personnel to ensure compliance with all applicable laws and rules concerning the Lifeline or Disabled programs.**

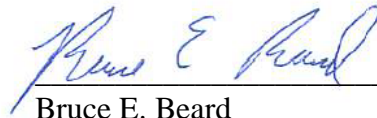
Mid-States Services, LLC. employees will be responsible for enrolling customers. Processing of the customer's applications, including review of all

applications and relevant documentation will be performed under Mid-States Services, LLC.'s supervision by managers experienced in the administration of the Lifeline program.

Mid-States respectfully requests that the Commission expeditiously grant wireline 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", is written over a horizontal line.

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

Dated: October 17, 2018

EXHIBIT A

Mid-States Service, LLC

Internet Service Rates

Mid-States Services, LLC

Internet Rates as of October 16, 2018

Residential Wireless Broadband Services

	1 Mbps	3 Mbps	6 Mbps	15 Mbps	25 Mbps
No Contract	\$39.95	\$49.95	\$59.95	\$79.95	\$99.95
1 Year	\$25.95	\$35.95	\$45.95	\$65.95	\$85.95
2 Year	\$20.95	\$30.95	\$40.95	\$60.95	\$80.95

Residential Fiber Broadband Services

50 Mbps	100 Mbps	250 Mbps	VOIP
\$49.95 / Month	\$59.95 / Month	\$79.95 / Month	\$29.95 / Month

Unlimited Local & Long Distance

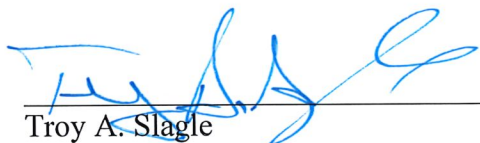
Business Fiber Broadband Services

Entry Business	Basic Business	Advanced Business	Business VOIP
50 Mbps	100 Mbps	250 Mbps	Unlimited Local & Long Distance
\$69.95 / Month	\$89.95 / Month	\$129.95 / Month	\$39.95 / Month

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 Supplemental Information No. 2 and certify that it is based upon information which is true and correct to the best of my knowledge.
2. Mid-States certifies that funding received will flow through to the subscriber.
3. Mid-States commits to solely conduct business under name granted for ETC status and will not use additional service of brand names.
4. Mid-States commits to comply with all FCC Lifeline program rules as laid out in 47 CFR Part 54 Subpart E.
5. Mid-States commits to comply with all MoPSC Lifeline program requirements whether funded solely through the FUSF or through the FUSF and the Missouri Universal Service Fund (MoUSF).



Troy A. Slagle
IT Manager

State of Missouri
County of Grundy

Subscribed and sworn before me this 17 day of October 2018.


Notary Public

Notary Seal:



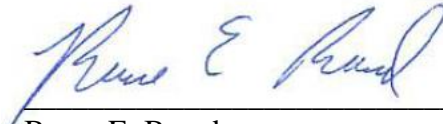
SANDRA J. BROWNING
My Commission Expires
February 2, 2022
Grundy County
Commission #14463978

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 17th 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

A handwritten signature in blue ink, appearing to read "Bruce E. Beard", is written over a horizontal line.

Bruce E. Beard
Cinnamon Mueller