BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Repository Case in Which to Gather Information about the Lifeline Program and Evaluate the Purposes and Goals of the Missouri Universal Service Fund	))))	File No. TW-2014-0012

Comments of the Missouri Small Telephone Company Group and the Missouri Independent Telephone Company Group

In response to the Missouri Public Service Commission's (Commission) invitation to comment on the possible creation of a Missouri Universal Service High-Cost Fund, the Missouri Small Telephone Company Group (STCG) and Missouri Independent Telephone Company Group (MITG),[1] hereinafter collectively referred to as the STCG, offer the following comments:

Introduction

The STCG is made up of thirty-five (35) small, Incumbent Local Exchange Carriers (ILECs), each serving between approximately 200 and 15,000 access lines in predominately rural areas within the state of Missouri. The STCG companies have a long history of providing excellent telecommunication service to rural Missouri. Many STCG members have been providing service for over 100 years, and the STCG companies continue to upgrade their networks to provide advanced telecommunications services, including broadband transmission services, in rural Missouri. In 2007, the REPORT ON MISSOURI BROADBAND AVAILABILITY issued by Commissioners Robert Clayton, III and Steve Gaw stated, "A more in-depth analysis of out-state Missouri suggests that small, rural telecommunications carriers have been more aggressive in offering

[1] See Attachment A.

broadband to customers throughout their service territories than their larger rivals."[2] The STCG companies' ability to provide state-of-the-art telecommunications services, including broadband transmission service, within their service territories is due, in no small measure, to the high-cost support funding they receive from the Federal Universal Service Fund (FUSF) and intercarrier compensation (ICC) they receive from other carriers who use the STCG companies' networks to originate and/or terminate telecommunications traffic.

In a 2011 report assessing the *Economic Impact of Removal of the Universal Service Fund in Missouri*,[3] Dr. David M. Mitchell, Director of the Bureau of Economic Research, Missouri State University, described the challenges faced by the STCG in providing telecommunications service in rural Missouri:

> These ILECs provide basic phone service in communities that, when compared to the rest of the country, are predominately poorer and have lower population densities than other communities. Consequently, these ILECs have higher costs than other telecommunications companies and are less able to pass their higher costs onto their lower-income customers who cannot afford the higher prices. Shifting funds away from these rural providers will impact their consumers through either significantly higher prices, severely diminished service, or both.[4]

As a result of the Federal Communication Commission's (FCC) November, 2011, Order transforming the FUSF and ICC (the "*Transformation Order*"),[5] FUSF support to the STCG companies, as well as ICC revenues, has been and will continue to be

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[2] *COMMISSIONERS' REPORT ON MISSOURI BROADBAND AVAILABILITY*, by Commissioners Robert Clayton, III and Steve Gaw, dated Sept. 18, 2007, available on PSC web site at: http://psc.mo.gov/CMSInternetData/Telecommunications/Broadband%20Report%202007/FINAL%20Broadband%20Report%20Sept%2018%20350pm.pdf.

[3] Copy attached as Attachment B.

[4] *Id*. at p. i.

[5] *See Connect America Fund et al*., WC Docket No. 10-90 et al., *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 Issued Nov. 18, 2011.

significantly reduced. At the same time, the *Transformation Order* required Eligible Telecommunications Carriers (ETCs), like the STCG companies, to provide broadband services which will require even more investment and on-going operation and maintenance costs than they have heretofore expended. In short, the FCC has required ETCs receiving FUSF high-cost support to spend even more money on their networks while at the same time providing less financial support to accomplish that mandate.

The FCC's *Transformation Order* has therefore created a real need for states like Missouri to consider the possibility of establishing their own high-cost funds to assist ILECs in continuing to provide state of the art telecommunication services, including broadband, in rural areas where the cost of doing so is significantly higher than in more populous urban areas. In a *State USF Whitepaper*, authors Michael J. Balhoff and Bradley P. Williams identified the challenges emerging for the states as a result of the FCC's 2011 *Transformation Order*:

> A growing universal service problem is emerging for the states in the wake of the Federal Reforms of 2011. The FCC has capped universal service funding at $4.5 billion while making significant changes to the funding criteria, and has mandated that terminating intercarrier compensation payments will disappear over the next five to seven years . . . (S)tates must adjust their approach to funding service in high-cost areas (which historically have accounted for up to 75% of the total funding need) or risk leaving thousands of communities and millions of households without adequate broadband and voice services.[6]

With this brief background in mind, the STCG welcomes the opportunity to offer the following comments on the specific questions contained in the Commission's January 15, 2014 *Order*.

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[6] *State USF Whitepaper: New Rural Investment Challenges*, p. 23, by Michael J. Balhoff and Bradley P. Williams, June 2013, available online at this address: http://www.balhoffrowe.com/pdf/BW%20State%20USF%20White%20Paper%20June%202013.pdf.

1. Does Missouri need a state high-cost fund? If no, please explain your position. If yes, please address the following questions in your response:

STCG Response: Yes.

a. Why is the existing federal high-cost program insufficient?

STCG Response: As noted above, the FCC's *Transformation Order* has had a significant and adverse effect on current and future revenues to be received by STCG companies, while at the same time requiring them to spend even more money on their networks and the services they provide. For example, the existing high-cost loop (HCL) support fund for FCC rate-of-return carriers, such as the STCG members, is being reduced each year by the Rural Growth Factor which reflects an inflation component and the percentage change in rural loops. In recent years, as loops served by rate-of-return carriers nationally have decreased, the federal HCL support amount has decreased. Between 2012 and 2014, the amount nationally has decreased by 4.9% or $38.6 million dollars.[7]

In addition, the FCC has required ILECs, such as the STCG members, to reduce their terminating intrastate access rates to interstate levels (which the STCG members have now done, resulting in a collective loss of approximately $9.6 million annually in terminating intrastate access revenues) and to forego any compensation for "local" wireless traffic terminating on their networks (resulting in a collective loss of revenue to the STCG companies of approximately $1 million annually).

[7] See http://transition.fcc.gov/wcb/iatd/neca.html, NECA's Overview of Universal Service Fund from 9/12, Submission of 2011 Study Results, USF12AF.ZIP, USF Filing Overview – 2012, p.2 – 2012 rural ROR fund cap of $795.1 million and https://www.neca.org/PublicInterior.aspx?id=1190, p. 2 – 2014 rural ROR fund cap of $756.5 million.

In the future, the *Transformation Order* requires rate-of-return ILECs to further reduce their terminating intrastate and interstate access rates to zero over a phase-in period ending in July, 2020, and to reduce intrastate originating access charges on originating Voice over Internet Protocol (VoIP) traffic to interstate rates effective July 1, 2014. While the FCC has established a new funding mechanism, known as Connect America Fund (CAF), to replace some of the lost FUSF support payments (i.e. Local Switching Support) and ICC (i.e., revenue received from interstate access rates and terminating intrastate access rates), the 2011 frozen base amount of these revenues along with the supplementary CAF-ICC support will be phased down by 5% per year starting in 2012. So, at best, the STCG companies will receive only 95% of the revenues they received in the previous year from the FUSF and ICC payments. In addition, originating access revenues may decline as customers shift their long-distance usage to wireless phones, e-mail, or IP-based voice services.

Because ETCs are required to spend more dollars on capital investment and operation and maintenance expenses in order to provide broadband service at speeds of at least 4 Mbps download and 1 Mbps upload, future CAF funding will further fall short of recovering the costs to be incurred by rural ILECs in providing these services. Therefore, it is essential for state commissions, like Missouri, to consider the possibility of establishing a state high-cost fund that will offset this funding gap.

b. How much state funding is needed?

STCG Response: At the present time, the STCG companies have not performed the detailed analysis necessary to determine the extent of the funding gap that will be created by the FCC's *Transformation Order* and other industry changes. Data from the USAC disbursements website[8] for 2011 shows that the thirty-five (35) STCG companies received disbursements from three continuing USF elements (High Cost Loop (HCL), Interstate Common Line Service (ICLS), and Safety Net Additive (SNA)) of $55.3 million. Similar data for the same three elements for 2013 total $50.2 million, or a reduction of $5.1 million. The frozen 2011 base period revenues for the thirty-five (35) STCG companies[9] is approximately $23.5 million. The CAF funding mechanism will provide an amount so that the future revenues from the revenue sources used to calculate the base period, plus a new end-user access recovery charge (ARC) will only decrease by 5% per year. Thus, the current loss from these revenue sources now in the second year of implementation is approximately $2.3 million as a result of the *Transformation Order*.

c. What consequences, if any, are anticipated if the Missouri Commission fails to establish a high-cost fund?

STCG Response: If the Commission fails to establish a high-cost fund to alleviate the funding gap created by the FCC's *Transformation Order*, there will be a decrease in the amount of funding available to invest in the ILEC networks serving rural, high-cost areas. This lack of investment will lead to a slowdown (or possibly a standstill) in the STCG's ability to deploy and maintain the state of the art networks necessary to provide advanced telecommunication services, including broadband transmission service, in rural areas of Missouri. This slowdown in investment is not mere speculation, but has already begun to occur as can be seen by *ex parte* comments filed with the FCC by

[8] http://www.usac.org/hc/tools/disbursements/default.aspx.

[9] This baseline includes for the relevant period, interstate switched access revenue requirement, terminating intrastate access revenues, and reciprocal compensation revenues.

rural local exchange carriers and third party investors/lenders. These comments demonstrate that rural ILECS are reluctant to invest in new and upgraded networks without the certainty that these investments will be recovered through future revenue streams, including FUSF high-cost support payments and ICC.

NTCA–The Rural Broadband Association ("NTCA") represents nearly 900 independent, community-based telecommunications companies that serve rural and small-town America. In January of 2013, NTCA surveyed its member company managers asking whether the FCC's ongoing USF/ICC reform efforts have caused their company to postpone or cancel any fixed network upgrades, and further asking respondents to quantify the aggregate cost of those postponements/cancellations. NTCA's survey revealed that the FCC's *Transformation Order* had a measurable negative impact on rural broadband investment:

> More than 100 small, independent telecommunication carriers have either postponed or cancelled plans to upgrade their network infrastructure as a result of regulatory uncertainty, according to a survey conducted by the National Telecommunications Cooperative Association (NTCA).
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> . . .
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> One hundred eighty-five NTCA member companies responded to the survey, which asked participants if they postponed or cancelled network upgrades and, if so, to apply a dollar value to the investment subject to postponement or cancellation. Sixty-nine percent of respondents (127) indicated they had postponed or cancelled projects, and 101 respondents provided investment values totaling more than $492 million.[10]

[10] National Telecommunications Cooperative Association (NTCA) survey: "*FCC USF/ICC Impacts Summary of Results*" available online at this address: http://www.ntca.org/images/stories/Documents/Advocacy/SurveyReports/FCC_USF_ICC_ImpactSurvey.pdf. One hundred-eighty-five (185) NTCA member companies responded to the survey, representing 34% of the unique email addresses in NTCA's membership email database. Based on this sample size, results of this survey can be estimated to be accurate to within +/- 6% at the 95% confidence level.

Two of the traditional financing sources for the STCG companies are CoBank[11] and the United States Department of Agriculture's Rural Utilities Service (RUS). Both CoBank and RUS have made ex parte presentations to the FCC describing the *Transformation Order's* negative impacts. CoBank explains:

> CoBank is concerned about the negative impact the USF/ICC *Transformation Order* (the Order) is having on investment in rural broadband. The various caps and limitations on universal service funding and intercarrier compensation, especially for rate-of-return carriers, are making it increasingly difficult for us to extend credit for the purpose of deploying ubiquitous rural broadband networks.[12]

And the RUS describes similar concerns:

> . . . demand for RUS loan funds dropped to roughly 37% of the total amount of loan funds appropriated by Congress in FY2012. Current and prospective RUS borrowers have communicated their hesitation to increase their outstanding debt and move forward with planned construction due to the recently implemented reductions in USF support and inter-carrier compensation (ICC) payments.[13]

Thus, the two primary government and quasi-governmental entities established to provide financing for rural development, including broadband deployment, recognize the

[11] CoBank is a national cooperative bank serving rural America. CoBank provides loans, leases, export financing and other financial services to agribusinesses and rural power, water, and communications providers in all 50 states. CoBank is a member of the Farm Credit System, which Congress formed in 1916 to fill a need for long-term agricultural credit. CoBank exists today as a nationwide network of banks and retail lending associations chartered to support the borrowing needs of U.S. agriculture and the nation's rural economy.

[12] Correspondence from Robert F. West, Senior Vice President, Communications Banking Group, CoBank, ACB, dated May 8, 2012 to FCC, available online at: https://prodnet.www.neca.org/publicationsdocs/wwpdf/0511cobank.pdf.

[13] February 15, 2013 correspondence from John Charles Padalino, Acting Administrator, Rural Utilities Service, available online at: https://prodnet.www.neca.org/publicationsdocs/wwpdf/21513usda.pdf

Transformation Order's negative impact on the ability of rural carriers to finance and plan for continued investment in rural networks.

A reduction in the investment in the STCG's rural networks has broader implications on Missouri's economy. As calculated by Dr. Mitchell:

> [O]utput in Missouri would decline by over half a billion dollars from what it otherwise would have been had the USF program not been eliminated. Employment would diminish by 3,500 jobs, with wages declining by over $162 million during the 2012 to 2016 period. This diminished economic activity will lead to smaller tax revenues. Federal tax revenues will fall by $36.4 million while state and local tax revenues would decline by almost $35 million.[14]

While Dr. Mitchell's 2011 analysis assumes a much greater loss of FUSF funding than the FCC ultimately ordered, the basic premise of Dr. Mitchell's approach remains valid. The loss of investment in Missouri will have adverse consequences on jobs, wages, and tax revenues. Implementing a State high-cost fund to replace some, or all, of the funding gap created by the FCC's *Transformation Order* will not only benefit rural telecommunications subscribers, but the State's economy as well.

2. What issues need to be addressed by the Public Service Commission in order to establish a high-cost fund?

STCG Response: The current statute provides a good, workable framework for the establishment of a Missouri high-cost fund. Section 392.248.2(1) RSMo provides that the funds from a state universal service fund shall be used, among other things, "to ensure the provision of reasonably comparable essential local telecommunications

[14] Attachment B, *Economic Impact of Removal of the Universal Service Fund in Missouri,* Dr. David M. Mitchell, Director of the Bureau of Economic Research, Missouri State University, p. i.

service . . . throughout the state including high-cost areas, at just, reasonable and affordable rates. . ." Accordingly, the issues the Commission needs to address are: 1) defining essential local telecommunications service; 2) determining the cost of providing essential local telecommunications service; 3) identifying high-cost areas within the state; 4) determining the just, reasonable and affordable rates for essential local telecommunication service within those high-cost areas; and 5) determining the necessary support payment, if any, for providing essential local telecommunication service in those high-cost areas.

Within those broad categories of issues, the Commission may also want to address additional issues such as whether broadband transmission service is an appropriate component of essential local telecommunication service. There is also an issue as to how to determine costs of providing essential local telecommunications service. For example, should costs be based on embedded (i.e., actually incurred) costs, or should they be based on hypothetical, forward-looking cost models? Should there be one just, reasonable and affordable rate for essential local telecommunication service, or should the Commission consider local calling scopes and other factors in determining more than one just, reasonable and affordable rate for essential local telecommunications service?

3. What service(s) should be supported?

STCG Response: Section 392.248.6(1) RSMo requires the Commission to determine the definition of essential local telecommunications service and to consider revising that definition on a periodic basis, not to exceed every three years. After enactment of Section 392.248, the Commission embarked on a rulemaking and implemented the rules defining essential local telecommunications service located at 4 CSR 240-Chapter 31. That definition has recently been changed as a result of the Commission's *Order of Rulemaking* issued in Case No. TX-2013-0324.[15]

If the Commission implements a state high-cost fund, then it may want to further review and refine this definition. For example, the FCC in its 2011 *Transformation Order* has now determined that broadband must be provided in response to a reasonable request in order for rate-of-return ETCs to be eligible for FUSF support. The Missouri Commission may want to make a parallel revision to its rules regarding the definition of essential local telecommunications service.

4. What type(s) of providers should be able to receive high-cost support?

a. Should funding be limited to landline providers?

b. Does a provider need to own facilities? If so, what kind of facilities?

c. Should wireless or broadband providers be able to draw support?

STCG Response: Currently, Section 392.248.4(1)(a) RSMo. provides that a telecommunications company's eligibility to receive support for high-cost areas is conditioned upon the requirement that the telecommunications company is "…offering essential local telecommunications service, using its own facilities, in whole or in part, throughout an entire high-cost area and having carrier of last resort obligations in that

[15] The Commission's new rules define "essential local telecommunications services" as being synonymous with "voice telephony service" which is defined as "voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and toll limitation services to qualifying Lifeline consumers. Toll limitation service does not need to be offered for any Lifeline service that does not distinguish between toll and non-toll calls in the pricing of the service." 31.010(6) and (21).

high-cost area; and . . . charging a rate not in excess of that set by the Commission for essential services in a particular geographic area . . ." The STCG believes these are appropriate criteria in order for eligible telecommunications companies to receive state high-cost support and that no changes need to be made in that criteria at this time.

At the present time, only landline companies (i.e., ILECs and CLECs) receive low income (i.e., Lifeline) support from the Missouri USF as they are the only carriers who are willing to be subject to the Commission's jurisdiction, provide essential local telecommunications service throughout a high-cost area, and assume the carrier of last resort obligation. Nevertheless, other carriers (e.g., IVoIP) could be eligible for MoUSF support as long as they are willing to submit to the Commission's jurisdiction, provide service using their own facilities, in whole or in part, throughout a high-cost area, and assume carrier of last resort obligation. It appears that wireless carriers would be excluded from receipt of MoUSF support since, pursuant to Section 392.020(54)(c) RSMo, the offering of wireless service pursuant to a license granted by the FCC under commercial mobile radio rules and regulation is excluded from Missouri's definition of telecommunications service. It is significant to note that while wireless carriers do not receive support from the MoUSF, they also do not contribute to the MoUSF.

Finally, the statute is silent as to the type of facilities that are necessary to qualify for facilities-based service. In the case of a landline provider, those facilities would typically include switching, transport, and subscriber line (i.e., loop) facilities which could be provided either through ownership of such facilities or purchase of unbundled network elements.

5. How should high-cost disbursements be determined? (*For example, how will it be determined if an area or provider needs high-cost support, and if so, how much?*)

STCG Response: Again, the STCG believes that the existing statute provides an appropriate framework for determining the amount of support for carriers providing essential local telecommunications service in high-cost areas. Section 392.248.6(3) RSMo. requires the Commission to determine, for each eligible telecommunications company by high-cost area, the cost of providing essential local telecommunications service in those areas and establish support payments necessary to such companies to ensure just, reasonable and affordable rates for telecommunications service. In other words, the extent to which the cost of providing essential local telecommunications service in a high cost area exceeds the just, reasonable and affordable rate for such service establishes an appropriate starting point for determining the amount of support necessary to provide essential local telecommunications service in high-cost areas. The Commission may also want to consider other sources of regulated revenue, such as ICC and FUSF/CAF support payments, in determining the amount of state high cost support to which an eligible telecommunications carrier is entitled.

6. What state(s), if any, have a state high-cost fund that Missouri should strive to mirror?

STCG Response: Most of the STCG member companies operate solely in the state of Missouri and are therefore not intimately familiar with other state high-cost funds and their various features. To the extent that the STCG is aware of other state high-cost funds, the STCG believes that the Missouri statutes establishing a state high-cost fund are unique and that other state funds (based on statutes unique to those states) may not be appropriate or fit within the confines of the current Missouri statutes.

7. Should an attempt be made to limit the size of the fund? (*For example, should the fund's total annual disbursement amount be capped? Should the fund have a sunset provision or a phase-out provision?*)

STCG Response: The costs of providing essential local telecommunications service in high cost areas will likely increase rather than decrease. Therefore establishing a cap on the fund would not appear to be economically justified, nor is such a cap contemplated by the statutes. Similarly, a sunset or phase-out provision does not make any sense as long as companies continue to make investments in their plant and continue to incur operations and maintenance costs associated with maintaining that plant.

8. What accountability requirements, if any, should be established to ensure a company is appropriately using state high-cost support?

STCG Response: The STCG believes that carriers receiving support from any state high-cost fund should be required to account for the use of those funds and should support the need for such funds as circumstances change over time. The STCG would recommend that the Commission review its annual ETC filing requirements and, to the extent necessary, revise those requirements accordingly to solicit the necessary information from ETCs receiving state support to demonstrate that any state high-cost funds received by an ETC are being used and applied appropriately. At the present time, however, it is not possible to identify what additional information might be needed.

9. Is there a need to revise how the Missouri USF is funded to accommodate a high-cost fund?

- **a. Should the base of services assessed to support the MoUSF be expanded?**
- **b. What exemptions should exist (e.g., Lifeline, Wholesale?)**
- **c. Should the MoUSF assessment be based on revenues or the services (connections) provided, or some other measure?**

STCG Response: Section 392.248.3 provides that the MoUSF "shall be funded through assessments on all telecommunications companies in the state which shall be based on Missouri jurisdictional telecommunication services revenue and other non-discriminatory factors as determined by the Commission." The STCG believes that this is an appropriate way in which to fund the MoUSF, and that no further changes to this funding approach need to be made at this time. While the current rules define Missouri jurisdictional revenues as excluding wholesale revenues, that exemption was premised on the notion that the carrier purchasing wholesale services (such as an interexchange carrier) was itself providing a retail service to end-users in Missouri (e.g., intrastate toll service) and reporting jurisdictional revenues and remitting monies to the MoUSF. Thus, the exemption of wholesale revenues was necessary to prevent "double taxation". In today's marketplace, however, there may be purchasers of wholesale services who are not providing a retail service in Missouri or reporting their revenues to the MoUSF (e.g., wireless carriers), so the exemption for such wholesale revenues from MoUSF assessment may not be justified. Also, it does not appear from the statute that a "connections based" funding mechanism would be permitted. The existing funding mechanism has seemed to work well for the MoUSF Lifeline program, so the STCG recommends that a similar approach to funding a high-cost fund ought to be adopted.

10. What revisions, if any, are needed to Missouri's statutes if the Public Service Commission intends to implement a high-cost fund?

STCG Response: The STCG is of the opinion that no revisions are necessary to existing Missouri statutes in order for the Commission to implement a state high-cost fund. The STCG does recognize that existing Commission high-cost rules, which were enacted over thirteen (13) years ago, will need to be substantially revised as the telecommunications landscape has changed dramatically since those rules were enacted. New carriers and technologies have entered the business market place (e.g., Interconnected Voice over Internet Protocol Providers) and as previously noted, significant changes have been made to the FUSF as well as ICC.

11. Is there anything else you would like to tell the Missouri Public Service Commission about implementation of a high-cost fund?

STCG Response: The STCG believes that implementation of a high-cost fund is critical to maintaining and expanding advanced telecommunications services within the rural, high-cost areas of the state of Missouri. As revenues from the FUSF and ICC continue to decline, the need for additional support to provide essential local telecommunications service in high-cost areas will continue to increase. The Commission should move quickly in this docket to establish workshops and implement the necessary rule revisions to establish a state high-cost fund.

Respectfully submitted,

Brydon, Swearengen & England, P.C.

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ATTACHMENT A

Missouri Small Telephone Company Group

BPS Telephone Company
Citizens Telephone Company of Higginsville, Mo.
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Farber Telephone Company
Fidelity Telephone Company
Goodman Telephone Company
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
K.L.M. Telephone Company
Le-Ru Telephone Company
Lathrop Telephone Company
Mark Twain Rural Telephone Company
McDonald County Telephone Company
Miller Telephone Company
New Florence Telephone Company
New London Telephone Company
Northeast Missouri Rural Telephone Company
Orchard Farm Telephone Company
Oregon Farmers Mutual Telephone Company
Ozark Telephone Company
Peace Valley Telephone Company, Inc.
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company

Missouri Independent Telephone Company Group

Alma Communications Company d/b/a Alma Telephone Company
Chariton Valley Telephone Corporation
Choctaw Telephone Company
MoKAN DIAL Inc.
Otelco Mid-Missouri, LLC