

**MO PSC File No. TO-2023-0436**  
**Responses to Staff Questions**  
**Received 07/12/2023 Pursuant to Investigation Order**

1. Fully explain the company's broadband deployment progress, to date, in Missouri.
  - a. AUC response: Aristotle Unified Communications L.L.C. ("AUC") has identified and begun deployment at 14 locations. AUC is waiting on approval from 6 tribal nations, environmental clearance, and electrical service to bring another 17 sites fully live. However, AUC has also been preparing for the transfer of its CAF II Auction blocks in Missouri to a Missouri-based CAF II Auction recipient who was awarded over \$100 million for 60,000+ Missouri locations. AUC has signed a confidentiality agreement with this company and is not including its name in this public document; however, AUC will provide the company's name upon request. This transfer will take place pursuant to Section 214 of the Communications Act of 1934, which allows transfers of USF obligations from one recipient to another. That company utilizes a different technology than AUC; therefore, radios will have to be redeployed before the network can be fully live. AUC has put off some additional deployments to prevent wasteful duplicative installations, but the Section 214 transfer process has dragged out much longer than originally anticipated. The current expected transfer date is 90-120 days from today. In addition, the new company has indicated that there are different and/or additional tower locations they prefer, meaning that some of the sites identified by AUC either will not be deployed or will be decommissioned. These changes will not cause a loss of broadband coverage to Missouri consumers. In fact, the technology deployed by the new company should increase both the speed and availability of broadband service to CAF locations.
  
2. Provide a copy of any documentation submitted to the Universal Service Administrative Company (USAC) regarding broadband deployment in Missouri.
  - a. AUC response: AUC provided data to USAC of specific address locations that AUC obtained through its address vendor. AUC's license with that vendor allows AUC to use that data specifically for submission into the USAC HUBB; however, under that license, AUC is not allowed to share that data with other entities for any purpose. AUC requested permission to share this data with Missouri PSC, but our vendor denied it.
  
3. Identify specific towers, location and date of installation of facilities used to deploy the company's fixed wireless broadband service in Missouri.
  - a. AUC response: Please see attached spreadsheet.
  
4. Explain why the company believes it is acceptable to claim broadband service has been deployed to a location when the company is unable to actually offer broadband service to that location. Cite any relevant FCC decisions supporting this belief.
  - a. AUC response: AUC is able to provide service from 14 vertical assets upon request. AUC is not advertising service because of the anticipated transfer of Auction blocks. The FCC has not defined specific advertising requirements.
  
5. Explain why the company is unable to currently provide broadband service to any Missouri consumers.

- a. AUC response: The premise of the question is inaccurate. AUC is currently able to provide service to some Missouri consumers but is not advertising for the reasons stated above. The new company will provide broadband services to Missouri consumers that are now or in the future would be within AUC's CAF II Auction coverage areas.
- 6. Explain the company's specific future plans for ensuring it meets subsequent broadband deployment milestones
  - a. AUC response: AUC is transferring 100% of subsequent broadband deployment milestone obligations to a Missouri-based CAF II Auction recipient pursuant to Section 214 of the Communications Act of 1934 which allows transfers of USF obligations from one recipient to another. Therefore, future deployment will be undertaken by that company, not AUC.

Name	Owner	Comp #	Comp Site Name	Address	Latitude	Longitude	FCC ID	Install Date
MO_OZAR_01	Pinnacle Tower Acquisition (Crown Castle)	873635		Highway 5	36.814872	-92.588458	1240767	12/31/2022
MO_OZAR_02	Pinnacle Tower Acquisition (Crown Castle)	873636		1215 County Road 117	36.717338	-92.519266	1240768	12/31/2022
MO_OZAR_03	Build				36.721997	-92.553959		
MO_OZAR_04	Sho Me Power Electric Cooperative				36.663858	-92.517073	1007469	
MO_OZAR_05	US Cellular Corporation	457311	Gainesville	35 mi NE Isabella, Isabella, MO 65676	36.614561	-92.558111	1006198	
MO_OZAR_06	American Towers	372488	Isabella MO	863 & Hwy 160 W Isabella, MO 65676	36.581402	-92.616518	1244938	
MO_OZAR_07	US Cellular Corporation	457482	Theodosia	County Road 640, Theodosia MO 65761	36.587864	-92.687300	1278994	
MO_OZAR_08	Build				36.65693	-92.6597		
MO_OZAR_09	Build				36.533334	-92.569107		12/31/2022 *TT
MO_OZAR_10	US Cellular Corporation	457345	Gainesville DT	4 miles S of Gainesville on County Rd 160502 Gainesville, MO 65655	36.594619	-92.426947	1245087	
MO_OZAR_11	Build				36.514807	-92.310695		12/31/2022 *TT
MO_OZAR_12	US Cellular Corporation	457483	Tecumseh	29361 US Highway 160 Tecumseh MO 65760	36.585692	-92.314653	1278822	12/31/2022
MO_OZAR_13	Build				36.657255	-92.270346		12/31/2022 *TT
MO_OZAR_14	Build				36.717697	-92.391468		12/31/2022 *TT
MO_OZAR_15	Build				36.775088	-92.440281		12/31/2022 *TT
MO_OZAR_16	Build				36.711692	-92.749495		
MO_OZAR_17	US Cellular Corporation	457355	Cloud 9 Ranch	HC 68 Box 244 Caulfield MO 65626	36.654444	-92.150611	1252295	
MO_HOWE_01	US Cellular Corporation	457319	Caulfield	81 US Highway 160 Caulfield MO 65626	36.621528	-92.112806	1006201	12/31/2022
MO_HOWE_02	Build				36.518526	-92.002505		12/31/2022 *TT
MO_HOWE_03	Build				36.548760	-91.890351		12/31/2022 *TT
MO_HOWE_04	US Cellular Corporation	457468	Lanton	13082 State Route 17 West Plains MO 65775	36.572306	-91.801911	1269497	12/31/2022
MO_HOWE_05	US Cellular Corporation	457486	Pottersville	8551 County Rd 6890 West Plains, MO 65775	36.740289	-91.998644	1287185	12/31/2022
MO_HOWE_06	US Cellular Corporation	457307	West Plains	6422 US Highway 63 West Plains MO 65775	36.818181	-91.908364	1006196	12/31/2022
MO_HOWE_07	Tom and Shawn Marhefka Trust				36.746861	-91.832325	1005437	12/31/2022
MO_HOWE_08	American Towers	372481	West Plains East	US 160 Hwy East West Plains MO 65775	36.755651	-91.720341	1243741	12/31/2022
MO_HOWE_09	US Cellular Corporation	457348	Hutton Valley	5913 US Highway 60 Mountain View MO 65548	36.977640	-91.844180	1245747	12/31/2022
MO_HOWE_10	American Towers	372475	Hwy 60 & 63	3985 US Hwy 60 @ Rt 63 Willow Springs MO 65793	36.970731	-91.929259	1244301	12/31/2022
MO_HOWE_11	Build				36.525857	-91.850362		
MO_HOWE_12	US Cellular Corporation	457456	South Fork	11463 CR 6690 West Plains MO 65775	36.634147	-91.963206	1267025	
MO_HOWE_13	US Cellular Corporation	457455	Peace Valley		36.826150	-91.800017	1267521	
MO_OREG_01	US Cellular Corporation	389312	Koshkonong	16 miles Nth of Koshkonong, Koshkonong MO 65692	36.620914	-91.655880	1245745	12/31/2022
MO_OREG_02	Tillman	TI-OPP-01919		411 Green Ave	36.512021	-91.547999	1308421	
MO_OREG_03	Build				36.549681	-91.312291		12/31/2022 *TT
MO_OREG_04	Build				36.626618	-91.237096		12/31/2022 *TT
MO_OREG_05	Build				36.606358	-91.417605		12/31/2022 *TT
MO_OREG_06	Build				36.788989	-91.225761		
MO_OREG_07	Build				36.811293	91.302434		
MO_OREG_08	Van McGibney				36.698382	-91.410414	1004990	
MO_OREG_09	US Cellular Corporation	389310	Thayer		36.509785	-91.552918	1005660	
MO_OREG_10	US Cellular Corporation	389324	Rover	Hwy 160CR419 West Plains MO 65755	36.765389	-91.566533	1268845	
MO_OREG_11	Build				36.608069	-91.276877		

\*TT: Temporary tower in place while permanent structure is built