

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

Application of Barry Technology)	
Services, L.L.C. for Designation as a)	
Telecommunications Carrier Eligible)	Case No. TA-2019-0114
for Federal Universal Service Support)	
pursuant to the Telecommunications)	
Act of 1996)	

**SUPPLEMENT TO
BARRY TECHNOLOGY SERVICES, L.L.C.
APPLICATION DESIGNATION AS AN ELIGIBLE CARRIER
PURSUANT TO § 254 OF THE TELECOMMUNICATIONS ACT OF 1996,**

COMES NOW Barry Technology Services, L.L.C. (“Barry”) and submits this Supplement to Barry’s October 29, 2019 Application for Designation as Eligible Telecommunications Carrier:

Service will be provided throughout the proposed service area, including area where Barry currently lacks facilities or network coverage.

1. Barry will provide service throughout the proposed high-cost designated service area. Customers in the Census blocks, as set forth in Attachment A to the original application, will be served by facilities constructed in the manner, and by the dates, as set forth in both Attachments D and E hereto. Attachment D is a diagram of Barry’s existing network. Attachment E is Exhibit 4 to Barry’s Long-Form 683 Application filed with the FCC, which describes the CAF-II buildout plans. Attachment E sets forth Barry’s technology and system design description, the network to be built, and other information. This information explains how Barry intends to provide service throughout the service area using awarded CAF Phase 2 funds, including areas where Barry currently lacks facilities or network coverage. The FCC has provided that Carriers

such as Barry may rely upon the information and certifications submitted in this Application. See pages 2-6 of the FCC Public Notice DA 18-274.

Common Management

2. The only company sharing common management with Applicant LLC is Barry Electric Cooperative. Barry Electric Cooperative has never received funds from the Federal Universal Service Fund (FUSF) or from any state universal service fund.

Conduct Business solely in Name granted for ETC Status

3. Applicant commits to solely conducting business under the name for which ETC status has been requested, Barry Technology Services, LLC. Applicant will not use additional service or brand names.¹

Full Lifeline/Disabled Support will be passed through

4. The current Disabled monthly support amount is \$6.50. The current Lifeline monthly support amount can be up to \$15.75 per month, but Barry understands the typical lifeline discount amount is currently \$9.25. Upon enrollment, the monthly bill of Disabled and Lifeline customers will be discounted by the current discount amount applicable to that customer. Thus, the full amount of support will be passed through to customers.

Lifeline/Disabled Service Initiation

¹ The correct legal name of the Applicant is Barry Technology Services, LLC. The applicant had filed to register a fictitious name of “goBEC Fiber Network”. Because of the language of 4 CSR 240-31.130.1.D.2 committing Applicant to solely conduct business using the name under which the ETC designation is granted, Applicant will cancel, withdraw, or non-renew such fictitious name, as the MoSOS of permits.

5. Barry will create an account in USAC's e-file and NLAD systems, and enter Barry's contact information utilizing FCC Form 498. Barry will sign up for USAC Lifeline Program Newsletters and NLAD Bulletins. Barry, if it obtains an ETC designation, will submit that order to USAC, and obtain a 498 ID.

6. When a prospective program customer contacts Barry regarding enrollment, Barry will ascertain whether the applicant is applying for the Lifeline or Disabled program, as it is Barry's understanding the individual program benefits are mutually exclusive. Barry will provide the currently effective Disabled or Lifeline Program application form, including the Household calculations form, to the prospective customer, so he or she can see what information and proof of eligibility are required prior to completion and execution. Barry's Missouri application form, as prescribed by the Missouri Public Service Commission, will be used for the Disabled Program. The applicant and Barry will complete and execute the application form, and Barry will submit it to the entity designated to receive such completed applications.

7. Barry is uncertain at this time as to what officially constitutes "Acceptable Proof of Eligibility" for Missouri Disabled program support. Barry will ask applicants for documentation confirming they are enrollees or participant in Veteran Administration Disability Benefits, State Blind Pension, State Aid to Blind Persons, State Supplemental Disability Assistance, or Federal Social Security Disability.

8. USAC's Form 5629 Lifeline Application Form, along with the USAC Form 5631 Lifeline Household Worksheet, will be used for the Lifeline Program. The applicant and Barry will complete and execute the application form, including the submission of proof of eligibility. Barry will review the proof submitted to assure it

conforms to the required documentation. To be eligible, the prospective customer must participate in either the Supplemental Nutrition Assistance Program (SNAP), Medicaid, Supplemental Social Security Income (SSI), Federal Public Housing Assistance (FPHA), Veterans Pension or Survivors Pension, or establish their income is at or below 135% of the federal poverty line (Barry does not believe it will be providing service to customers on Tribal Lands). Barry understands that USAC directs the following as acceptable proof of eligibility for these programs:

- a. SNAP--SNAP Card or Award Letter showing the name of the program, name of the participant, address of the participant, and date of award;
- b. Medicaid--Medicaid card showing the name of the program and name of the participant;
- c. SSI—US Social Security Admin. Award Letter showing the name of the program, name of the participant, address of the participant, date of the award, award amount;
- d. FPHA—United States Award Letter showing the name of the program, name of the participant, award amount, or a public housing assistance lease that shows the assistance credit used.
- e. Veterans Pension or Survivor's Pension—United States pension grant letter with participant's name and address, decision about the monthly entitlement amount, and payment start date; or a COLA letter showing a cost of living adjustment and effective date; or a Survivor's Benefit Summary Letter showing the survivor's claim number, related veteran's number, and monthly award amount.
- f. for income-based eligibility—the prior year's state or federal tax return, a current income statement from an employer or paycheck stub, social security statement of benefits, unemployment or worker's compensation statement of benefits, divorce decree, child support award, or other official document containing income information, which must be computed based upon household size and state of location.

9. Barry understands eligibility for customers in Missouri is not yet available through the Lifeline National Eligibility Verifier. Barry further understands there is no Missouri agency or administrator responsible for determining Lifeline eligibility. Barry further understands the National Lifeline Accountability Database (NLAD) is not yet

available for Missouri eligibility determinations. Barry understands that, as a consequence, it is currently responsible for obtaining acceptable proof of eligibility.

One discount per household

10. Barry will refer to the USAC administered database to ascertain if the household designated by an applicant is already receiving a Lifeline discount. With respect to Disabled program households, the only information Barry can go to will be its own record of households for existing Disabled customers. If the database or company records indicate a household is already receiving a discount, it will so notify the applicant and provide an opportunity for explanation. If Barry determines the household would receive 2 disabled or lifeline discounts, it will deny the disabled application, as only one discount may be received per household.

Identity and Primary Address

11. Until Barry can verify identities with an accepted third party identification tool, Barry will follow USAC publications and ask for the following identification documents to verify identity: Unexpired driver's license, birth certificate, W-2, prior year tax return, social security card, certificate of naturalization, certificate of U.S. citizenship, unexpired permanent resident card, unexpired permanent resident alien card, unexpired US Government military state or tribal issued ID, unexpired passport, military discharge documentation, unexpired weapons permit, government assistance program document that includes proof of identity, statement of benefits from a qualifying program that includes proof of identity, or unemployment or worker's compensation statement of benefits.

Annual Verification

12. Barry understands it is responsible to conduct an annual verification of eligibility. If a customer fails to adequately respond to Barry's annual verification request, or is no longer eligible for support, Barry will terminate the service discount, and will de-enroll the ineligible subscriber in the USAC NLAD within one business day, as required by USAC.

13. An affidavit supporting this Supplement to the original Application follows.

WHEREFORE, on the bases of the foregoing Barry respectfully requests that the Commission grant this Application and expand Barry's current ETC designation to the additional service area census blocks awarded Barry in the CAF II Auction, and for a designation of Lifeline/Disabled only ETC status for Barry, Newton, and McDonald Counties, and for the Commission to certify or submit such designation to the FCC, and for such other orders as are deemed necessary or convenient in this matter.

By 

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ATTORNEY FOR BARRY
TECHNOLOGY SERVICES, L.L.C.

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was electronically mailed, this 15th day of November, 2018, to the following parties:

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

General Counsel
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102



Attorney for ~~Barry~~ Barry Technology Services, L.L.C.

VERIFICATION

I, JR Smith, having been duly sworn upon my oath, that I am the Manager of Fiber Services of Barry Technology Services, L.L.C., the Applicant, and am authorized by the Applicant to execute the foregoing Supplement to the Original Application and to make this Affidavit on its behalf, and that the matters and things state in the foregoing Supplement are true and correct to the best of my knowledge, information and belief.

Handwritten signature of JR Smith

JR Smith

STATE OF MISSOURI)
)
COUNTY OF BARRY)

Subscribed and sworn to me, a Notary Public, on this 15 day of Nov, 2018.



JENNIFER EARLENE ANTLE
My Commission Expires
December 16, 2018
Barry County
Commission #14632098

Handwritten signature of Jennifer Earlene Antle
Notary Public

My commission expires December 16, 2018