

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

In the Matter of the Application of T-Mobile Central            )  
LLC for Designation as an Eligible Telecommunications        ) **File No. RA-2012-0195**  
Carrier for Purposes of Low Income Support Only            )

**STAFF RESPONSE**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its Response, states as follows:

1. On December 22, 2011, T-Mobile Central LLC (“the Company”), a wireless carrier, filed an application with the Missouri Public Service Commission (“Commission”) seeking designation as an Eligible Telecommunications Carrier (“ETC”) for the purpose of receiving federal universal service fund support for low income customers through Lifeline and Link Up programs (on March 30, 2012, the Application was revised to only relate to Lifeline service, as the FCC had eliminated the Link Up program).


2. On May 1, 2012, the Staff filed a Recommendation that the Commission deny the Company’s request for ETC status, based on apparently inconsistent statements in its Application and concerns about enforcement actions in other jurisdictions. The Company replied with extensive explanations and has allayed many of the Staff’s concerns. Although the Staff may propound one more Data Request about the use of ETC funds, it has, for the most part, completed its review of the Company’s explanations. Having done so, it is likely that the Staff will be satisfied with a written, verified commitment by the Company to notify the Staff within a specified period of certain regulatory actions. The Staff will also require a written, verified statement that the company will commit to comply with all state and federal regulations, although specific wording has not yet been presented to the Company for review.

3. The Staff is of the firm opinion that companies have an obligation to update their applications with new information when any statement therein becomes untrue or could mislead the reader to an inference that is untrue. The Staff is working with the Company to develop an agreement whereby the Company will keep us current on regulatory developments in other jurisdictions. The Staff has high expectations that the Company will be amenable to such an agreement.

4. In light of the ongoing nature of the exchange of information and the Staff's request for commitments from the Company, the Staff asks that the Commission take no further action in this matter until the Staff and the Company have accomplished these goals and the Staff has filed a subsequent recommendation.

**WHEREFORE**, the Staff requests that the Commission suspend any further action in this matter until it receives another Staff Recommendation.

Respectfully submitted,



Colleen M. Dale  
Senior Counsel  
Missouri Bar No. 31624  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-4255 (Telephone)  
[cully.dale@psc.mo.gov](mailto:cully.dale@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 18<sup>th</sup> day of May, 2012.

