

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

In the Matter of the Application of Easy Telephone)
Service Company for Designation as an)
Eligible Telecommunications Carrier in the) **File No. TA-2011-0164**
State of Missouri)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation, states as follows:

1. On December 7, 2010 Easy Telephone Service Company (“the Company”), a wireless carrier, filed an application with the Missouri Public Service 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 LinkUp programs. On February 4, 2011, the Staff recommended that the Company be granted ETC status, but withdrew that recommendation on February 28 after receiving a document that asserted that the Company had engaged in fraudulent activity. On March 11, the Company responded to the assertions with over 82 pages of documentation. The Staff requested and was granted an extension of time until April 11, 2011 to complete its review and make its recommendation.

2. The Staff has completed its review of the submitted documentation and once again recommends that the Company be granted ETC status. As the attached Staff Memorandum demonstrates, in the Staff’s opinion, the Company has met all the requirements, both state and federal, to become designated as an eligible telecommunications carrier for receipt of federal universal service fund low-income support. The Company is not delinquent or non-compliant with any of the Commission’s reporting or assessment requirements; the Company is a mobile wireless telecommunications provider whose operations are not regulated by the Commission.

3. In light of assertions of misconduct in this matter and several other matters now pending before the Commission, The Staff asks that the Commission include the following language in its Order Granting ETC Status:

This grant of ETC status is dependent on the Applicant's compliance with federal and state rules concerning collection and distribution of USF funds. In particular, the Applicant shall comply with 47 CFR §§54.7, 54.8, 54.410, 54.415 and 54.416 (understanding that Missouri's legal mandates require compliance with 4 CSR 240-31.050). In addition, although the Applicant is not regulated by the Commission, it is expected to comply with 47 CFR §64.2001, et seq., and its Missouri counterpart 4 CSR 240-33.160.

WHEREFORE, Staff recommends that the Commission grant Easy Telephone Service Company's Application to be designated an Eligible Telecommunications Service for the receipt of low-income support (including Lifeline and LinkUp support) from the federal Universal Service Fund as a wireless telecommunications carrier and include the above-stated language in its ordered paragraphs.

Respectfully submitted,



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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 11th day of April, 2011.

A handwritten signature in black ink, appearing to be "Allan D. [unclear]".