

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

In the Matter of a Request for )  
Variance from the Filing )  
Requirements of 4 CSR 240-31.130 )

**Case No. TE-2018-0372**

## STAFF CLARIFICATION

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Clarification* in this matter hereby states:

1. Staff filed a *Request for Variance and Motion to Expedite* June 19, 2018. The Commission issued an *Order* June 20, 2018, seeking clarification of Staff's request.

2. The Commission in its *Order* asks Staff to make a formal recommendation as to whether or not it is appropriate to waive the filing requirement of Form 481 pursuant to 4 CSR 240-31.130(3)(A) and 4 CSR 240-31.130(3)(B). The Federal Communications Commission's (FCC) order is not altogether clear as to whether it specifically intended for eligible telecommunications carriers (ETC) to be excused from filing Form 481 for 2018. That being said, Staff finds that the FCC's hesitation appears to have stemmed from concern about whether the Universal Service Administrative Company's (USAC) e-filing system would be operational prior to July 1, which upon investigation appears to be up and running. Therefore, Staff would recommend that it is appropriate for the Commission to waive the requirement to file Form 481 pursuant to 4 CSR 240-31.130(3)(A) and 4 CSR 240-31.130(3)(B).

3. Staff asked the Commission to determine if it was appropriate to waive the provision of 4 CSR 240-31.130(3)(A) requiring the filing of Form 481, however, Staff intended for the Commission to issue a determination regarding the requirement to

file Form 481 pursuant to both 4 CSR 240-31.130(3)(A) and 4 CSR 240-31.130(3)(B). It corrects that error with this filing.

**WHEREFORE**, Staff prays that the Commission will issue an order finding it is not necessary for ETCs to file Form 481 with the Commission pursuant to 4 CSR 240-31.130(3)(A) or 4 CSR 240-31.130(3)(B) for 2018; expedite its determination of Staff's request; and grant such other and further relief as the Commission considers just in the circumstances.

**/s/ Whitney Payne**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 21<sup>st</sup> day of June, 2018, to all counsel of record.

**/s/ Whitney Payne**