

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

In the Matter of Proposed)
Modifications to the Missouri)
Universal Service Fund) Case No. **TO-2019-0346**

STAFF’S NOTICE REGARDING RECOMMENDATION

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

1. The Commission opened a docket May 15, 2019, in response to Staff’s *Motion to Open Docket and Recommendations* regarding the Missouri Universal Service Fund. Pursuant to the Commission’s request, Staff filed a *Memorandum* outlining certain scenarios which could result from its recommendations in this docket and three parties filed responses to Staff’s *Memorandum*. The Commission discussed this matter in its *Agenda* meeting on November 13, 2019. Staff now clarifies some points of its recommendation.

2. First, Staff has referenced its concerns regarding an ample notice period to telecommunications providers affected by the decision in this matter. Staff recommends any cessation of the assessment be effective January 1, 2020. To clarify, companies should still be obligated to remit any payments to the fund after this date for assessments imposed up to December 31, 2019. Staff further supports a flexible window of time in which the affected providers may implement the assessment change and any change in the Lifeline and Disabled support amount, to be completed no later than February 1, 2020, assuming an effective

order date of no later than December 1, 2019. This timing should provide companies approximately 60 days to make billing adjustments for the assessment and the discounts provided to Lifeline and Disabled program subscribers.

3. Additionally, Staff noted that the Commission appears to support a “full increase” in support amounts but relied on the \$14.75 dollar amount referenced in Staff’s *Memorandum*. To clarify, Staff recommended that both the Lifeline and the Disabled support amounts total \$24.00. To ensure that Lifeline program subscribers do not feel continuing negative impacts from the FCC’s reduction in support, Staff’s recommendation is that state support when paired with the federal support would equal the \$24.00 discount. To provide clarity to providers, the Commission’s order could indicate the total Lifeline support, state and federal combined, will be \$24. Additionally, the Disability program would not receive any federal support so it would need to be increased to the full support amount of \$24.00. Please see the following chart to demonstrate this point:

VOICE + QUALIFYING* BROADBAND

	Current	Effect of Staff’s Recommendation
Federal Lifeline Support	\$9.25	\$9.25
State Lifeline Support	\$6.50	\$14.75
TOTAL	\$15.75	\$24.00

*Broadband speed equal to/or greater than 20/3

VOICE-ONLY OR VOICE + NON-QUALIFYING* BROADBAND

	Current	Effect of Staff's Recommendation
Federal Lifeline Support	\$9.25	\$7.25
State Lifeline Support	\$6.50	\$16.75
TOTAL	\$15.75	\$24.00

*Broadband speed less than 20/3

WHEREFORE, Staff prays that the Commission will accept its *Notice*; 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 18th day of November, 2019, to all counsel of record.

/s/ Whitney Payne