

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

In the Matter of the Application of                    )  
dPi Teleconnect, LLC for Designation as        )  
an Eligible Telecommunications Carrier.        )        **File No. CO-2010-0054**

**STAFF’S CLARIFICATION FOR RECOMMENDATION ON  
AMENDED APPLICATION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned attorney, and provides this clarification for the Staff’s Recommendation filed December 30, 2010:

1. On October 8, 2010, dPi Teleconnect, LLC (dPi or Company) filed an application to amend its Eligible Telecommunications Carrier (ETC) status that the Commission granted the Company on June 2, 2010. dPi currently receives federal universal service fund low income support for providing certain wireline services in AT&T Missouri service territories, but seeks to amend its status to include the provision of wireless services.

2. On December 15, 2010, dPi supplemented its October 8, 2010 application with additional information requested by the Staff to allow further review of the Company’s application, specifically, the verification procedures for customer eligibility and the procedures planned to protect any eligibility documentation received.

3. The Staff continues to support the position that dPi meets all the requirements for ETC designation in order to receive low-income support. Through this pleading, the Staff wishes to clarify its recommendation for dPi’s provision of wireless service, in that the Staff recommends that the Commission’s Order include a finding that states:

The Commission finds that dPi meets all the requirements for Eligible Telecommunications Carrier (ETC) designation and grants ETC status to dPi as a wireless carrier for the receipt of low-income support from FUSF, including the

receipt of Lifeline and Linkup support, for discounts offered on Company service plans to eligible customers.

4. The undersigned inadvertently omitted the Lifeline and Linkup finding from the Staff's December 30, 2010 pleading.

**WHEREFORE**, the Staff respectfully requests to clarify its December 30, 2010, pleading and recommends that the Commission issue an order (1) that finds dPi meets all the requirements for Eligible Telecommunications Carrier designation and grants ETC status to dPi as a wireless carrier for the receipt of low-income support from FUSF, including the receipt of Lifeline and Linkup support, for discounts offered on Company service plans to eligible customers; (2) direct the Company to file prior to the provision of any wireless services an updated tariff with an effective date thirty days from the date of issuance stating the rules and regulations governing the Company's provision of such services; and (3) deny dPi's request for approval of this application to serve as future eligibility for Missouri USF support, so as to allow the Staff to review a Company application at that time to determine eligibility.

Respectfully submitted,

**/s/ Jennifer Hernandez**

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on Mark P. Johnson and Lisa Gilbreath, Sonnenschein Nath & Rosenthal LLP, Attorneys for dPi Teleconnect, LLC, at [mark.johnson@snrdenton.com](mailto:mark.johnson@snrdenton.com) and [lisa.gilbreath@snrdenton.com](mailto:lisa.gilbreath@snrdenton.com); and The Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) this 18<sup>th</sup> day of January, 2011.

**/s/ Jennifer Hernandez**