

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

**Comments of the Missouri Small Telephone Company Group and
the Missouri Independent Telephone Company Group**

In response to the Missouri Public Service Commission’s invitation to comment Staff’s Missouri Universal Service Fund (USF) proposals, the Missouri Small Telephone Company Group (STCG) and Missouri Independent Telephone Company Group (MITG),¹ hereinafter collectively referred to as the STCG, offer the following comments:

Introduction and Summary

The STCG is made up of thirty-five (35) small, Incumbent Local Exchange Carriers (ILECs), each serving between approximately 200 and 15,000 access lines in predominately rural areas within the state of Missouri. The STCG companies have a long history of providing excellent telecommunication service to rural Missouri. Many STCG members have been providing service for over 100 years, and the STCG companies continue to upgrade their networks to provide advanced telecommunications services, including broadband transmission services, in rural Missouri.

The STCG supports Staff’s proposals to: (a) continue the suspension of the MoUSF assessment through September 30, 2022; (b) increase the MoUSF support amount for Lifeline-only voice services by \$5.25 from \$18.75 to \$24.00 if the FCC continues with its plan to eliminate support on December 1, 2021; and (c) provide

¹ See Attachment A.

companies with the flexibility to implement the support level change at any time from December 1, 2021 through February 1, 2022.

STCG COMMENTS

A. Continued suspension of the Missouri USF assessment is appropriate.

The STCG agrees with Staff's proposal to continue suspension of the MoUSF surcharge through September 30, 2022. Staff should continue to monitor the MoUSF balance to ensure that the MoUSF meets its statutory purpose.

B. Staff's proposal to increase MoUSF Lifeline voice-only support amounts by \$5.25 from \$18.75 to \$24.00 in the event that FCC follows through with its plan to eliminate Lifeline voice-only support is in the public interest and should be adopted.

Currently, the FCC has scheduled federal Lifeline voice-only support to phase out on December 1, 2021. If the FCC follows through with its plan, then low-income participants in the MoUSF Lifeline program who subscribe to voice-only service will see a price increase of \$5.25. Staff's proposal to increase MoUSF voice-only support would offset this possible increase and ensure that Missouri's low-income Lifeline voice-only customers continue to pay the same amount for service and are not faced with increased payments for service at the end of the year. Furthermore, increasing the MoUSF Support amount is consistent with the Missouri Universal Service Fund's statutory mandate: "To assist low-income customers and disabled customers in obtaining affordable telecommunications services." §392.248.2(2). MoUSF Funds are available to satisfy the statute's mandate, and they should be used for that purpose.

C. Companies should be provided with flexibility to implement any changes in the MoUSF voice-only Lifeline support.

The STCG agrees with Staff's proposal that "companies should be given flexibility to implement this support level change any time from December 1, 2021 through February 1, 2022." Many Missouri companies use third-party billing entities to prepare and issue monthly billing statements, and it may take 60-90 days to implement the necessary billing system changes.

Respectfully submitted,

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ATTACHMENT A

Missouri Small Telephone Company Group

BPS Telephone Company
Citizens Telephone Company of Higginsville, Mo.
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Farber Telephone Company
Fidelity Telephone Company
Goodman Telephone Company
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
K.L.M. Telephone Company
Le-Ru Telephone Company
Lathrop Telephone Company
Mark Twain Rural Telephone Company
McDonald County Telephone Company
Miller Telephone Company
New Florence Telephone Company
New London Telephone Company
Northeast Missouri Rural Telephone Company
Orchard Farm Telephone Company
Ozark Telephone Company
Peace Valley Telephone Company, Inc.
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company

Missouri Independent Telephone Company Group

Alma Communications Company d/b/a Alma Telephone Company
Chariton Valley Telephone Corporation
Choctaw Telephone Company
MoKAN DIAL Inc.
Oregon Farmers Mutual Telephone Company
Otelco Mid-Missouri, LLC