

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

In the Matter of the Application of Air Link Rural)
Broadband, L.L.C. for Designation as an Eligible)
Telecommunications Carrier in the State of Missouri) Case No. DA-2019-0102

**SECOND SUPPLEMENTAL FILING TO THE APPLICATION AND VERIFICATION OF
AIR LINK RURAL BROADBAND, L.L.C.
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE
STATE OF MISSOURI**

I. INTRODUCTION

Air Link Rural Broadband, L.L.C. (“Air Link” or the “Company”), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”) and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”), and the rules and regulations of the Missouri Public Service Commission (“Commission”), including 4 CSR 240.31.130, hereby submits these supplemental statements to its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri.

Air Link makes this Second Supplemental Filing in response to Conexon LLC’s intervention filing in this matter, dated January 9, 2019¹, and in particular to address comments made by Mr. Jonathan Chambers of Conexon, LLC, in regard to Air Link’s use of fiber-to-the-premises architecture in the areas for which it has requested Commission designation as and ETC.

1. See “Response to the Supplemental Filing to the Application and Verification of Air Link Rural Broadband, LLC for Designation as an Eligible Telecommunications Carrier in the State of Missouri”, 1/9/2019.

II. RESPONSE TO THE COMMISSION REGARDING CONEXON, LLC

1. Air Link's FCC Bidding Behavior in the Federal Communications Commission's Connect America Fund – Phase II, Auction 903.

In the Auction, Air Link made its auction bids based on the use of a fixed fiber architecture. It intends to offer 100/20 Mbps and ultimately faster services throughout the proposed ETC area, and to meet all FCC requirements for speed and latency testing. Having history as a wireless Internet provider, it also maintains spectrum in and beyond Howard County.

2. There is Clarity Regarding Air Link's Proposed Fiber-Based Facilities Architecture.

Air Link's FCC CAF Phase II proposal and ETC implementation plan are to build a fiber-to-the-premises network in the proposed ETC area. Air Link has committed to pass each location in the proposed ETC area with fiber, pending ETC designation by the Commission. This will be completed within the timeline Air Link has committed to, under the terms of FCC Auction 903. Fiber-to-the-premises is a long term means of providing services.

Air Link is not able to comment on the capabilities of all wireless technologies or the ways in which they may be implemented. Advances in wireless serving technologies have yielded amazing increases in speeds and reliability while average serving costs continue to decline. We expect these trends to continue. Given the company's commitment to use a fiber-based architecture, Air Link does not feel such a discussion is germane to its application.

III. CONCLUSION

Based on the evidence presented in Air Link's application, responses to Staff questions, and to its responses to Conexon's intervention, Air Link requests that it be expeditiously granted ETC authority to enable it to receive the CAF II reverse auction funds it has been allocated.

Respectfully submitted,

AIR LINK RURAL BROADBAND, L.L.C.

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Dated: January 14, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 28th day of December 2018, to the following parties:

General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

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Amanda Grellner
McCuskey Law Office

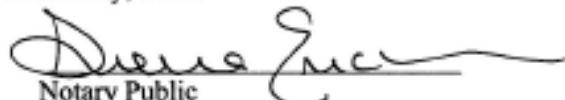
AFFIDAVIT & VERIFICATION

I, Casey Ingarten, a natural person, do hereby swear and affirm that I am an officer of Applicant and that the following information and statements are true and correct to the best of my knowledge and belief:

1. I am an authorized representative of Air Link Rural Broadband L.L.C. and acknowledge that I have the authority to execute this Affidavit and Verification on behalf of Air Link Rural Broadband, L.L.C. and have read the foregoing Application and certify that the foregoing Application is based upon information which is true and correct to the best of my knowledge.
2. Air Link Rural Broadband, L.L.C. commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier (“ETC”) in the census blocks wherein funds are being allocated to Air Link Rural Broadband, L.L.C. through the Connect America Fund (“CAF”) Phase II reverse auction.
3. Air Link Rural Broadband, L.L.C. certifies that it will meet all of the applicable FCC requirements for designation as an ETC under the §214(e) of the Act and all applicable Commission requirement’s for designation as an ETC.


Casey Ingarten
Principal, Air Link Rural Broadband, LLC

State of Missouri
County of ~~Lin~~ Chariton
Subscribed and sworn before me this 14 of January, 2019.


Notary Public

Notary Seal:

