

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

In the Matter of the Petition of Conexon Connect)
LLC for Expanded Lifeline-Only Designation as) **File No. DA-2022-0305**
an Eligible Telecommunications Carrier)

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and submits its Recommendation as follows:

1. On May 2, 2022, Conexon Connect LLC (“Conexon” or “Company”) filed an Application for expanded designation as an Eligible Telecommunications Carrier (“ETC”) in order to receive federal and state Lifeline and Disabled discounts.

2. The Company is registered in the state of Missouri as an interconnected voice over internet protocol (IVoIP) provider.

3. Commission rule 20 CSR4240-31.016 governs the specific ETC requirements that each applicant must meet. Staff conducted an investigation and has provided a memorandum attached to this pleading as Appendix A. Staff’s memorandum outlines the reasons why Staff believes Conexon has met the requirements of 20 CSR 4240-31.016. Staff also believes that the Commission should expand the Conexon’s ETC status for the purpose of receiving federal low income support and Missouri USF support for the Lifeline and Disabled programs in the areas identified in Attachment A of the Company’s application.

WHEREFORE, Staff recommends that the Commission grant Conexon Connect LLC request for expansion as an eligible telecommunications carrier for the purpose of receiving federal and state Lifeline and Disabled Support and that it grant such other and further relief as the Commission finds appropriate in the circumstances.

Respectfully submitted,

/s/ Ron Irving

Ron Irving

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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 16th day of June, 2022, to all counsel of record.

/s/ Ron Irving

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. DA-2022-0305

From: Kari Salsman, Senior Research/Data Analyst
Telecommunications Department

Subject: Staff's Recommendation to Conexon Connect LLC's Request for
Expansion of Existing ETC Designation

Date: June 16, 2022

On May 2, 2022, Conexon Connect LLC (Conexon) filed an application for expansion of their designation as an Eligible Telecommunications Carrier (ETC).¹ The company is a registered IVoIP in Missouri.² Conexon seeks to expand its ETC designation in order to provide federal and state Lifeline and Disabled discounts to additional census blocks.³

Federal authority enables state commissions to grant ETC status to a company.⁴ Missouri's ETC application requirements are contained in existing Missouri Commission rule 20 CSR 4240-31.016. Staff reviewed the company's request for compliance with Missouri's rules as well as federal requirements. In Staff's opinion the company has adequately met all requirements. Consequently Staff supports the company's application for expansion of its ETC status.

Staff recommends the Commission expand Conexon Connect LLC's ETC status for the purpose of receiving federal low income support and Missouri USF support for the Lifeline and Disabled programs in the area identified by census blocks in Attachment A of the company's application.

¹ ETC status granted in Case No. DA-2021-0193. Authority to participate in the Missouri USF granted in Case No. DA-2021-0292.

² Case No. DA-2021-0226.

³ Census Block Service areas are listed in Attachment A of application.

⁴ 47 U.S.C. §214(e)(2) and FCC rule §54.201.