

3. The Company is presently registered in the state of Missouri as an interconnected voice over internet protocol (IVoIP) services provider. The Company included Exhibit A with its *Application*, which outlines the specific census blocks for which it requests ETC designation.

4. Commission rule 20 CSR 4240-31.016 governs the specific eligible telecommunications carrier requirements that each applicant must meet. Applications must also comply with 20 CSR 4240-2.060 and shall be verified by oath as to the truthfulness contained in the application by an officer or director of the applicant.

5. The FCC requires all winning bidders to submit a Long Form that includes information about a company and its plans to fulfill its bid requirements, which must be approved prior to a company receiving any funds. The ETC process under 20 CSR 4240-31.016 does not address and is not designed to assess a company's technology broadband speed and latency capabilities.

6. 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 yondoo Broadband has met the requirements of 20 CSR 4240-31.016 and should receive ETC designation.

7. yondoo Broadband sought waiver of the 60-day notice requirement pursuant to the Commission's rule 20 CSR 4240-4.017.

WHEREFORE, Staff recommends that the Commission approve yondoo Broadband, LLC's, request for designation as an eligible telecommunications carrier for the purpose of receiving federal high-cost and low-income support and in compliance with

the RDOF Auction; that the designation be specific to the census blocks identified in Exhibit A of the *Application*; authorize the company to receive MoUSF support; grant waiver of the 60-day notice provision; and that it grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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 16th day of March, 2021, to all counsel of record.

/s/ Whitney Payne

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. DA-2021-0258

From: Kari Salsman, Research/Data Analyst
John Van Eschen, Regulatory Compliance Manager
Telecommunications Department

Subject: Staff's Recommendation to Approve yondoo Broadband, LLC's
Request for ETC Designation

Date: March 16, 2021

On February 15, 2021, yondoo Broadband, LLC (yondoo) filed an application for designation as an Eligible Telecommunications Carrier (ETC) for the purpose of receiving federal high cost and low-income universal service fund support.¹ yondoo is a registered IVoIP provider in Missouri.² The company was recently awarded federal Rural Digital Opportunity Fund (RDOF) support to build broadband facilities in more rural areas.³ The RDOF funding requires the company to extend broadband service to a designated number of locations in certain census blocks. yondoo seeks ETC designation in the won census blocks.⁴ yondoo is seeking Missouri USF support for Lifeline program purposes.

Federal authority enables state commissions to grant ETC status to a company.⁵ 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 rule as well as federal requirements. In Staff's opinion the company has adequately met all ETC application requirements. Consequently Staff supports the company's application for ETC status.

Staff recommends the Commission grant ETC status to yondoo Broadband, LLC for the purpose of receiving federal high-cost and low-income support and Missouri USF support for the Lifeline program in the area identified by census blocks in Exhibit A of the company's application.

¹ yondoo Broadband, LLC is a subsidiary of MidAtlanticBroadband, Inc.

² Case No. DA-2021-0256. The company's principal office is located in Baltimore, MD.

³ The company has been awarded \$54,834 over 10 years to extend broadband service to 100 locations. The company deploys fiber as the last mile technology.

⁴ Census Block Service areas are listed in Exhibits A of ETC application.

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