

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of LTD)
Broadband LLC for Designation as an Eligible)
Telecommunications Carrier for Purposes of) **File No. DA-2021-0205**
Receiving Federal Universal Service Support)

NOTICE OF DEFICIENCY

Issue Date: January 11, 2021

On January 7, 2021, LTD Broadband LLC (LTD Broadband) filed its application for designation as a wireless Eligible Telecommunications Carrier. Attorney Kristopher E. Twomey, whose office is identified as in Washington, D.C., signed the application as attorney for LTD Broadband. It does not appear, however, from the face of the application, whether Mr. Twomey is licensed to practice law in the state of Missouri,¹ and the application contains no motion for leave to practice before the Commission pro hac vice.

The application states that LTD Broadband is a corporation. Commission Rule 20 CSR 4240-2.040(5), addressing practice before the Commission, states:

A natural person may represent himself or herself. Such practice is strictly limited to the appearance of a natural person on his or her own behalf and shall not be made for any other person or entity.

The basis for this Commission rule is found in Sections 484.010 and 484.020, RSMo.² Section 484.010 defines the practice of law as “the appearance as an advocate in a representative capacity or the drawing of papers, pleadings or documents or the performance of any act in such capacity in connection with proceedings pending or prospective before any court of record, commissioner, referee, or any body, board,

¹ A review of the Missouri Bar’s on line publication of attorneys currently licensed to practice in Missouri, <https://mobar.org/> does not contain Mr. Twomey’s name.

² All statutory citations refer to RSMo 2016 unless otherwise noted.

committee, or commission constituted by law or having authority to settle controversies.”
Section 484.020 restricts the practice of law and engagement in law business to licensed attorneys.³

As it does not appear from the face of the application whether Mr. Twomey is licensed to practice law in Missouri, the application is defective in that the applicant is a corporation whose application must be signed and presented by an attorney licensed in Missouri or otherwise authorized per a duly granted motion pro hac vice. Because the application is deficient, the Commission will take no further action in this matter until such time as the deficiency is corrected. Per Rule 20 CSR 4240-2.116, the Commission may dismiss this cause for lack of prosecution if no action has occurred within 90 days.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is written in a cursive, flowing style.

Morris L. Woodruff
Secretary

Ronald D. Pridgin, Regulatory Law Judge,
by delegation of authority pursuant
to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 11th day of January, 2021.