

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Application of)
)
EASY TELEPHONE SERVICE COMPANY) Docket No. _____
DBA EASY WIRELESS)
)
to Amend and Expand Its Designation as an)
Eligible Telecommunications Carrier to Receive)
Federal Lifeline and State Lifeline Support)
_____)

**APPLICATION TO AMEND AND EXPAND
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION AND
REQUEST FOR WAIVER OF 20 CSR 4240-4.017**

COMES NOW Easy Telephone Service Company d/b/a Easy Wireless (“Easy Wireless” or the “Company”), pursuant to Section 214(e)(2) of the Federal Communications Act of 1934, as amended (the “Act”),¹ the rules and regulations of the Federal Communications Commission (“FCC”),² and Rules 2.060 and 31.016 of the Missouri Public Service Commission (the “Commission”),³ and submits this Application to Amend and Expand its Eligible Telecommunications Carrier Designation (“Application”) and Request for Waiver of 20 CSR 4240-4.017, stating:

BACKGROUND

1. The Commission designated the Company as an eligible telecommunications carrier (“ETC”) for purposes of receiving federal and state Lifeline support in Missouri in certain exchanges in Docket No. TA-2011-0164 (Nov. 22, 2011). The Company now seeks to expand that designation to apply statewide to be able to provide Lifeline service to all eligible low-income

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.201, 54.202; *see also Lifeline and Link Up Reform and Modernization; et al.*, 27 FCC Rcd 6656 (2012) (“*Lifeline Reform Order*”).

³ 20 CSR 4240-2.060; 20 CSR 4240-31.016.

households without restrictions on its service area. The Company does not seek access to Universal Service Fund support for the purpose of providing service to high-cost areas.

2. The Company meets all of the statutory and regulatory requirements for designation as an ETC in the state of Missouri. The Commission's grant of this Application would advance the public interest by enabling the Company to expand the availability of Lifeline service to substantially more low-income consumers in Missouri. Accordingly, the Company respectfully requests the Commission grant its Application for expanded ETC status statewide as expeditiously as possible.

INFORMATION REQUIRED UNDER COMMISSION RULE 2.060

3. Commission Rule 2.060(1)(A). The Company has a principal place of business and headquarters at 4352 SE 95th St Ocala, FL 34480, 877-476-3451 (telephone), 352-233-2724 (facsimile).

4. Commission Rule 2.060(1)(B) and (E). The Company is a Florida corporation authorized to do business in Missouri. Copies of the Company's Certificate of Good Standing from the Missouri Secretary of State and registration of the fictitious name "Easy Wireless" are attached hereto as Exhibit 1.

5. Commission Rule 2.060(1)(H). The Company provides voice and broadband internet access wireless services in Missouri and also Arkansas, Kentucky and Oklahoma and is designated as an ETC in all such states. It is also an approved participant in the FCC's Affordable Connectivity Program for broadband throughout the United States. In its prior Order (the "ETC Designation Order"), the Commission designated Easy Wireless as an ETC to provide wireless Lifeline service "throughout the non-rural Southwestern Bell Telephone Company, L.P. , d/b/a AT&T Missouri service territories, as set forth in Exhibit A to its application."⁴ At the time the Commission issued the ETC

⁴ ETC Designation Order, at 4.

Designation Order, Easy Wireless's underlying carrier was Sprint Spectrum (Sprint).⁵ In order to best serve its customers and provide quality service and coverage throughout Missouri, Easy Wireless seeks to expand its ETC service area to be statewide so that it can offer Lifeline service throughout the full coverage area of its underlying carrier, T-Mobile.⁶ Easy Wireless customers will benefit from its underlying carrier's ability to remain functional in emergency situations, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

6. Commission Rule 2.060(1)(I). The Company requests that all inquiries, correspondence, notices, orders, and decisions in this matter be directed to:

Carl J. Lumley, #32869MO
CURTIS, HEINZ, GARRETT & O'KEEFE, P.C.
130 S. Bemiston, Suite 200
Clayton, MO 63105
314-725-8788 (telephone)
clumley@chgolaw.com

and

Joshua Guyan
Debra McGuire Mercer
Nelson Mullins Riley & Scarborough LLP
101 Constitution Avenue, NW
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⁵ In 2020, Sprint and T-Mobile US, Inc. (T-Mobile) merged and now operate as T-Mobile. By April 2022, Easy Wireless customers using the Sprint network were transitioned to T-Mobile. Service that had previously been provided on Sprint's network is now provided on T-Mobile's network to the extent that T-Mobile's network has coverage within Easy Wireless's ETC designated service area.

⁶ Statewide ETC designation is consistent with Commission precedent. *See In the Matter of Boomerang Wireless, Inc. d/b/a enTouch Wireless for Expanded Service Area as a Wireless ETC in the State of Missouri (Low Income Only)*, Order Granting Application for Expanded Service Area, File No. RA-2016-0218 (March 17, 2016), at 1 ("Boomerang Wireless, Inc. d/b/a enTouch Wireless' service area is expanded to include all exchanges in the State of Missouri.").

With a copy to:

Tina C. Allen
Compliance Director
Telecom Service Bureau Inc.
4352 SE 95th Street
Ocala, FL 34420
tallen@telecomservicebureau.com

7. Commission Rule 2.060(1)(K). The Company states it does not have any pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court that involve customer service or rates within the past three (3) years.

8. Commission Rule 2.060(1)(L). The Company states that no annual reports or assessment fees due to the Commission are overdue.

9. Commission Rule 2.060(1)(M). The Company attaches an affidavit by an authorized officer of the company.

INFORMATION REQUIRED UNDER FCC RULES

10. Section 214(e)(1) of the federal Act and the FCC's rules set forth certain requirements for ETC designation.⁷ The Company meets each of these requirements.

11. FCC Rule 54.201(c); FCC Rule 54.202(b). An ETC applicant must demonstrate the ETC designation is consistent with the public interest, convenience, and necessity, and in the case of an area served by a rural telephone company, demonstrate the public interest will be met by an additional designation.

12. Expansion of the Company's ETC designation will serve the public interest, convenience, and necessity. The expanded ETC designation will permit the Company to provide

⁷ 47 U.S.C. § 214(e)(1); 47 C.F.R. §§ 54.201, 54.202.

Lifeline services to low-income consumers throughout Missouri and ensure those consumers have access to wireless voice and broadband services. This will further the goals of the Commission and the FCC by expanding the reach of digital connectivity to promote economic growth and ensure quality communications services are available at “just, reasonable, and affordable rates.”⁸ As the FCC has observed, “an important goal of the [federal] Act is to open local telecommunications markets to competition. Designation of competitive ETCs promotes competition and benefits consumers in rural and high-cost areas by increasing customer choice, innovative services, and new technologies.”⁹

13. Further, expansion of the Company’s ETC designation will have no material impact on the federal or Missouri Lifeline funds. Lifeline support follows the customer, so a customer taking Lifeline service from either the Company or another provider will cause an identical amount of impact upon the federal and state universal service funds.

14. FCC Rule 54.201(d). An ETC applicant must be a “common carrier” as defined by federal law.¹⁰ The Company is a common carrier. The Company is authorized by the FCC to provide wireless telecommunications services. The Company will provide voice and broadband Internet access service and voice service throughout the state.

15. FCC Rule 54.201(d)(1); FCC Rule 54.201(i). An ETC applicant must demonstrate that it is capable of providing and will continuously provide the supported services throughout the service area either by using its own facilities or a combination of its own facilities and the resale of another carrier’s services. The Company will offer the services that are supported by the federal

⁸ 47 U.S.C. § 254(b)(1).

⁹ *Federal-State Joint Board on Universal Service*, 16 FCC Rcd 48, ¶ 17 (2000).

¹⁰ 47 U.S.C. § 153(11).

universal service support mechanisms in the Designated Service Area using the facilities of other providers (currently T-Mobile).

16. Under current FCC rules, the two services supported by the federal universal service support mechanisms are (1) voice telephony services and (2) broadband Internet access services.¹¹ Eligible voice telephony services must provide voice grade access to the public switched telephone network (“PSTN”) or its functional equivalent, minutes of use for local service provided at no additional charge, access to emergency 911 and enhanced 911 service in locations where implemented, and for qualifying low-income consumers, toll limitation service.¹² Eligible broadband Internet access services must provide the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service.¹³

17. The Company certifies that it will offer voice and broadband services that comply with the FCC’s requirements. The Company’s voice offering will provide voice grade access to the PSTN and will include unlimited local calling. In addition, the Company’s voice offering will provide consumers with access to 911 and enhanced 911 to the extent local governments have implemented such services. The FCC eliminated the requirement to provide toll limitation services if the Lifeline offering provides a set amount of minutes that do not distinguish between toll and non-toll calls.¹⁴ As explained below, the Company is not required to provide toll limitation service in connection with its Lifeline service offering because the Company plans to offer unlimited voice

¹¹ 47 C.F.R. § 54.101.

¹² 47 C.F.R. § 54.101(a)(1).

¹³ 47 C.F.R. § 54.400(l).

¹⁴ *Lifeline Reform Order* ¶ 49.

calling within the United States for a fixed monthly price. If a customer chooses a calling plan that does not include unlimited voice calling with the United States, the Company will provide toll limitation service at no cost.

18. Similarly, the Company's broadband Internet access service offering will provide consumers with the capability to transmit data to and receive data from all or substantially all Internet endpoints. The Company's broadband Internet access service offering will meet the minimum service standards required by the FCC's rules for Lifeline service offerings.¹⁵

19. FCC Rule 54.201(d)(2); FCC Rule 54.405(b)-(d). An ETC applicant must demonstrate that it will advertise the availability of its service offerings using media of general distribution. The Company will publicize the availability of its voice and broadband service offerings throughout the state using media of general distribution.¹⁶ The Company will use a combination of digital and traditional media, such as the Internet, outbound email, outdoor advertising, radio advertising, newspaper and magazine advertising, and direct marketing materials, as well as physical retail locations.

20. In addition, with respect to Lifeline services, the Company will publicize the availability of its Lifeline service offerings in a manner reasonably designed to reach those likely to qualify for the service.¹⁷ Using easily understood language, the Company will indicate on all materials describing its Lifeline service that: (1) it is a Lifeline service; (2) Lifeline is a government assistance program; (3) the service is non-transferable; (4) only eligible consumers

¹⁵ 47 C.F.R. § 54.408.

¹⁶ 47 C.F.R. § 54.201(d)(2).

¹⁷ 47 C.F.R. § 54.405(b).

may enroll in the program: and (5) the program is limited to one discount per household.¹⁸ The Company also will disclose its DBA name on all materials describing the Lifeline service.¹⁹

21. FCC Rule 54.201(h); FCC Rule 54.202(a)(4). An ETC applicant seeking to provide Lifeline services must demonstrate it is financially and technically capable of providing Lifeline service in compliance with the FCC's rules. The FCC has stated that the "relevant considerations" for satisfying this requirement would be whether the applicant previously offered services to non-Lifeline consumers, how long the applicant has been in business, whether the applicant intends to rely exclusively on universal service fund disbursements to operate, whether the applicant receives funds from other sources, and whether the applicant has been subject to enforcement action or ETC revocation proceedings in other states.²⁰

22. The Company is financially and technically capable of offering Lifeline services in Missouri. The Company has been offering services in Missouri and several other states for many years. It has the financial resources and technical support it needs, as shown on **confidential Exhibit 2**.²¹ The Company provides non-Lifeline voice services in Missouri and other states today and will not rely exclusively on universal service fund disbursements to operate. Finally, the Company has not been subject to enforcement action or ETC revocation proceedings in any state.

23. FCC Rule 54.202(a)(1). An ETC applicant must certify that it will comply with the service requirements applicable to the support it receives and submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its

¹⁸ 47 C.F.R. § 54.405(c). For these purposes, the term "materials describing the service" includes all print, audio, video, and web materials used to describe or enroll in the Lifeline service offering, including application and certification forms. *See id.*

¹⁹ 47 C.F.R. § 54.405(d).

²⁰ *Lifeline Reform Order* ¶ 388.

²¹ The financial information on Exhibit 2 is confidential pursuant to 20 CSR 4240-2.135(2)(A)5.

proposed service area. A five-year network improvement plan is no longer necessary for entities seeking Lifeline-only designation.²² The Company certifies that it will comply with the service requirements applicable to Lifeline support in Missouri.

24. FCC Rule 54.202(a)(2). An ETC applicant must demonstrate that it can remain functional in emergency situations. The Company certifies it will have the ability to remain functional in emergency situations in Missouri, relying on the capability of its underlying carrier T-Mobile. T-Mobile has a reasonable amount of back-up power to ensure functionality without an external power source, is able to re-route traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. Separate FCC rules also require the Company to implement certain back-up power requirements.²³

25. FCC Rule 54.202(a)(3). An ETC applicant must certify that it will comply with all applicable service quality standards and consumer protection rules. The Company certifies that it will comply with service quality standards and consumer protection rules applicable to its provision of service in Missouri.

26. FCC Rule 54.202(a)(5); FCC Rule 54.202(a)(6). FCC rules require Lifeline applicants to provide information describing the terms and conditions of voice telephony service and broadband Internet access service plans to be offered to Lifeline subscribers. For Lifeline voice services, the FCC has determined that providers may satisfy the obligation to provide local usage via service offerings that bundle local and long distance minutes.²⁴ If an ETC offers plans to Lifeline subscribers that are generally available to the public, the ETC may provide summary

²² *Lifeline Reform Order* ¶ 386.

²³ 47 C.F.R. § 9.20.

²⁴ *Lifeline Reform Order* ¶ 49.

information regarding such plans, such as a link to a public Web site outlining the terms and conditions of such plans.²⁵

27. Easy Wireless will continue to provide all supported services required by Section 54.101(a) of the FCC's Rules²⁶ throughout the State of Missouri, including voice telephone service and broadband Internet access service. Easy Wireless commits that its Lifeline-supported services will continue to meet or exceed the minimum service standards set forth in 47 C.F.R. § 54.408, including as they change going forward. The Company's current Lifeline offering includes unlimited text messaging, 1,000 talk minutes and 25 MB of high-speed mobile data for no charge. Easy Wireless's Terms of Use are available on its website.²⁷ Many of Easy Wireless's Lifeline customers choose to combine Easy Wireless's Lifeline plan with its Affordable Connectivity Program (ACP) plan for a bundled plan that includes unlimited text messaging, talk minutes and 7.5 GB of high-speed mobile data (with additional data being provided at lower speeds). Easy Wireless currently offers its Lifeline wireless plan, as well as a bundled Lifeline/ACP plan, throughout its existing service area in Missouri and will offer the same plans throughout its expanded ETC service area.

28. The Company's pricing is reasonably comparable to the price of similar services in urban areas pursuant to FCC requirements.²⁸ By way of example, the FCC's 2024 urban average monthly rate is \$34.27, and the reasonable comparability benchmark for voice services, two standard deviations above the urban average, is \$55.13.²⁹ Accordingly, each ETC providing fixed

²⁵ 47 C.F.R. § 54.401(d).

²⁶ 47 C.F.R. § 54.101(a).

²⁷ See <https://myeasywireless.com/terms-of-use/>.

²⁸ 47 C.F.R. § 54.313(a)(2), (3).

²⁹ *Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2024 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers*, WC Docket No. 10-90, Public Notice, DA 23-1172 (Dec. 15, 2023).

voice service must certify to the FCC in 2024 that the pricing of its basic residential voice services is no more than \$55.13. The FCC has adopted similar benchmarks for broadband Internet access service, which vary based on the speed and usage allowance.³⁰

29. FCC Rule 54.405(a). An ETC providing Lifeline services must make Lifeline service available to qualifying low-income consumers. The Company certifies that its Lifeline service offering will conform to the definition of “Lifeline” in the FCC’s rules.³¹

30. FCC Rule 54.405(e). An ETC providing Lifeline services must implement certain de-enrollment procedures for Lifeline customers. The Company certifies it will comply with the FCC’s de-enrollment procedures and will have general de-enrollment procedures in place for Lifeline services. In accordance with FCC requirements, the Company will de-enroll Lifeline customers for no longer qualifying for Lifeline service, for duplicative support, for non-usage, for failure to re-certify, and when requested by the Lifeline customer.

31. Easy Wireless also: (1) informs customers that do not pay for service on a monthly basis of the need to use the service at least once every thirty (30) days as required by Section 54.407(c)(2); (2) provides notice to such customers after 30 days of non-usage that they must use the service within 15 days or their service will be terminated as required by Section 54.405(e)(3); and (3) requires such customers to activate their Lifeline service as required by Section 54.407(c)(1). Easy Wireless does not provide a customer with a handset (if the customer qualifies for a free or discounted handset) or otherwise activate Lifeline service until the applicant completes the application in the National Verifier and receives eligibility approval.³²

³⁰ *Comparability PN* at 3.

³¹ 47 C.F.R. § 54.401(a).

³² 47 C.F.R. § 54.410(a).

32. FCC Rule 54.409; FCC Rule 54.410. Section 54.410 of the FCC's rules requires ETCs to certify and verify a Lifeline customer's initial and continued eligibility. Easy Wireless has processes in place to facilitate compliance with federal customer enrollment requirements. Specifically, the Company relies on the National Verifier and the National Lifeline Accountability Database (NLAD), each of which is administered by the Universal Service Administrative Company (USAC), to determine an applicant's eligibility for Lifeline service. Every applicant is required to complete the standardized Lifeline application in the National Verifier environment, which covers the necessary information collection, disclosures, and certifications required by Section 54.410(d) of the Lifeline rules.³³ For applicants verified as being eligible by USAC's National Verifier, Easy Wireless completes enrollment by transmitting the required information into NLAD as required by Section 54.404(b)(6) of the FCC's rules.

33. Easy Wireless has additional processes in place to guard against waste, fraud, and abuse, and to ensure compliance with FCC rules designed to achieve that objective, including, general notice and de-enrollment requirements set forth in Section 54.405(e)(1), transmission of information to NLAD and recordkeeping requirements set forth in Sections 54.404(b)(6) and 54.417, annual certification and reporting requirements set forth in Sections 54.416 and 54.420, and reimbursement claims processes established by USAC consistent with Sections 54.403 and 54.407(a). Easy Wireless also complies with Sections 54.410(f) of the FCC's rules governing annual subscriber re-certification of eligibility and coordinates with USAC's National Verifier and NLAD systems to manage additional de-enrollments related to USAC-administered benefit transfers and failure to re-certify.³⁴ If Easy Wireless receives a request for de-enrollment from a subscriber, it processes the request within two (2) business days in accordance with Section 54.405(e)(5).

34. Easy Wireless has direct contact with all applicants for its Lifeline service, either in person through its employees, agents, or representatives, or via SMS messaging, the telephone, mail, or online. In

³³ 47 C.F.R. § 54.410(d).

³⁴ 47 C.F.R. §§ 54.405(e), 54.410(f).

addition, in accordance with Section 54.406 of the FCC's rules, Easy Wireless's enrollment representatives are required to register in USAC's Representative Accountability Database.

35. Finally, Easy Wireless provides and requires Lifeline-specific training for all personnel, whether employees, direct contractors, or representatives, who interact with new or prospective customers regarding the FCC's Lifeline eligibility and certification rules and the Company's practices and policies designed to implement those rules. Easy Wireless has a zero-tolerance policy for waste, fraud, and abuse, and personnel are instructed to notify the Company's compliance team if they suspect that anyone might be providing false information or attempting to obtain a duplicate Lifeline benefit.

INFORMATION REQUIRED UNDER COMMISSION RULE 31.016

36. Commission Rule 31.016(2)(B)1. The owners of the Company are Joseph Fernandez (85%) and Jose Cortes Jr. (15%).

37. Commission Rule 31.016(2)(B)2. Attached as **Exhibit 3** is a list of the Company's officers, along with relevant biographical information.

38. Commission Rule 31.016(2)(B)3. No affiliated entities have received funds from the federal universal service fund (including Lifeline support, high-cost support, or the schools and libraries or rural health care funds) or any state universal service fund in the past.

39. Commission Rule 31.016(2)(B)4. To the best of the Company's knowledge, there has been no matter brought in the last ten (10) years by any state or federal regulatory or law enforcement agency against any of the individuals, entities, managers, officers, or directors currently sharing common ownership or management with the Company involving fraud, deceit, perjury, stealing, or the omission or misstatement of material fact in connection with a commercial transaction.

40. Commission Rule 31.016(2)(B)5. Information concerning the Company's service offerings is available at <https://myeasywireless.com/terms-of-use/>.

41. Commission Rule 31.016(2)(B)6.A. The Company will comply with the ETC requirements set forth in Commission Rule 31.015.

42. Commission Rule 31.016(2)(B)6.B. The Company seeks support from the Missouri universal service fund for the State of Missouri.

43. Commission Rule 31.016(2)(B)6.C. The Company commits to notifying the Commission of any changes in its contact information, including through the Commission's online EFIS system.

44. Commission Rule 31.016(2)(B)6.D. The Company is in compliance with all reporting and assessment obligations imposed by the Commission.

45. Commission Rule 31.016(2)(B)6.E. The Company is in compliance with its contribution obligations under the federal universal service fund.

46. Commission Rule 31.016(2)(B)7. The Company has not sought or obtained a waiver of any ETC requirement from the FCC.

REQUEST FOR WAIVER OF RULE 4.017

47. Commission Rule 4.017 requires any person that intends to file a case to file a notice with the Secretary of the Commission a minimum of 60 days prior to filing such case. The rule, however, states a party may request a waiver of the requirement for good cause.

48. The Company respectfully requests a waiver of Commission Rule 4.017 for good cause to avoid a delay of 60 days to make this filing, which could delay Missouri consumers from receiving discounted voice and broadband Internet access service.

49. The Company confirms it has had no communication with any office of the Commission within the prior 150 days regarding any substantive issue likely to be germane to this proceeding.

CONCLUSION

In its ETC Designation Order, the Commission found that designation of Easy Wireless as an ETC would serve the public interest. Similarly, expansion of Easy Wireless's ETC service area throughout the state will serve the public interest by increasing the number of low-income households that can benefit from the Company's high quality mobile voice, text, and data services. Easy Wireless's online and in-person, real-time distribution methods, which rely upon Internet-enabled compliance checks, will enable the Company to bring Lifeline service to eligible consumers throughout the state. Easy Wireless's in-person distribution methods include the operation of six retail stores in Missouri. Moreover, Easy Wireless's Lifeline rate plan allows feature-rich mobile connectivity for qualifying subscribers at low cost to subscribers without the burden of credit checks or contracts.

The Commission's grant of Easy Wireless's request to expand its designated service area also would promote competition and increase customer choice for low-income households

residing in Missouri. Indeed, its presence as a competitor will lead to additional competition within the Lifeline market which should help improve the rate of program participation by eligible subscribers. For the foregoing reasons, grant of this Application is in the public interest.

Based on the foregoing, Easy Wireless respectfully requests that the Commission promptly grant this Application and expand Easy Wireless's Lifeline-only ETC service area to be statewide.

Respectfully submitted,

/s/ Carl J Lumley
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*Counsel for Easy Telephone Service Company
d/b/a Easy Wireless*

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 18 day of January 2024, to the following parties:

General Counsel
Missouri Public Service Commission
PO Box 360
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staffcounsel@psc.mo.gov

Office of Public Counsel
PO Box 7800
Jefferson City, MO 65102
opcservice@opc.mo.gov

AFFIDAVIT

I, Tina Allen, a natural person, do hereby swear and affirm that I am the Secretary for Easy Telephone Service Company dba Easy Wireless (the "Company"); that I am authorized to make this Affidavit on behalf of the Company; that the foregoing Application was prepared under my direction and supervision; and that the contents of the foregoing Application are true and correct to the best of my knowledge, information, and belief. I also hereby certify that neither I, nor any other member of this filing party, has had communications with a Commissioner, Commission Advisor, Regulatory Law Judge, member of the General Counsel, or any member of their support team in the 150 days prior to the filing date of this Application regarding any substantive issue included in this filing.

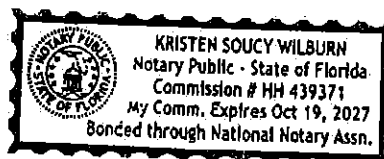
Tina C. Allen

State of FL
County of Manon

Subscribed and sworn before me this 12th day of January 2024.

Kristen S. Wilburn

Notary Public



EXHIBITS

Exhibit 1 Good Standing and Name Registration

Exhibit 2 Confidential Financials

Exhibit 3 Officer Biographies