

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

In the Matter of IM Telecom, LLC)
d/b/a Infiniti Mobile) **Case No. RA-2024-0197**
Application for Designation as an)
Eligible Telecommunications Carrier)

RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation* in this matter hereby states:

1. On December 14, 2023, IM Telecom, LLC, d/b/a Infiniti Mobile (Company) filed an *Application* requesting the Commission designate it as an Eligible Telecommunications Carrier (ETC) for the sole purpose of providing Lifeline service to qualifying Missouri consumers. The Company’s request, if approved, would permit it to receive federal support for Lifeline services.
2. The Company does not have a certification or registration to provide services in Missouri but is a wireless service provider. Infiniti seeks a statewide designation to provide Lifeline services to anywhere it has the facilities and capability to provide wireless coverage.
3. 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.
4. 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 Infiniti has met the requirements of 20 CSR 4240-31.016 and should receive ETC designation.

WHEREFORE, Staff recommends that the Commission approve IM Telecom, LLC, d/b/a Infiniti Mobile's request for designation as an eligible telecommunications carrier for the purpose of receiving Lifeline support; the designation be granted statewide; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Scurlock

Whitney Scurlock
Chief Deputy Staff Counsel
Missouri Bar No. 64078
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7434 (Telephone)
(573) 751-9285 (Fax)
whitney.scurlock@psc.mo.gov

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, to all parties or their representatives pursuant to the Service List maintained by the Commission's Data Center for this file, on this 19th day of January, 2024.

/s/ Whitney Scurlock

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. RA-2024-0197

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

Subject: Staff's Recommendation to Approve IM Telecom, LLC d/b/a Infiniti
Mobile's Request for ETC Designation

Date: January 19, 2024

On December 14, 2023 IM Telecom, LLC d/b/a Infiniti Mobile filed an application for designation as an Eligible Telecommunications Carrier (ETC) for the purpose of receiving federal low-income support and is requesting ETC designation on a statewide basis. The company is a wireless service provider and is not certificated or registered by the Missouri Commission.

Federal authority enables state commissions to grant ETC status to a company.¹ 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 statewide ETC status to IM Telecom, LLC d/b/a Infiniti Mobile for the purpose of receiving federal low-income support.

ATTACHMENT A

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