

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

In the Matter of the Investigation of )  
Aristotle Unified Communications, LLC ) **File No. TO-2023-0436**  
Related to the Connect America Fund )  
Phase II Auction )

**STAFF MOTION TO FILE USAC AUDIT RESULTS**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and for its *Motion to File USAC Audit Results* in this matter states as follows:

1. The Universal Service Administrative Company is presently conducting an audit of Aristotle Unified Communications, LLC’s, broadband services pursuant to its receipt of Connect America Fund Phase II federal funding. It presently appears that this case before the Missouri Public Service Commission will be resolved prior to the completion of that audit.

2. This case centers on principles of federal law and defers certain determinations to the federal authorities on whether Aristotle is complying with program requirements. As pointed out in this proceeding, the Universal Service Administrative Company has been investigating Aristotle’s compliance in meeting its broadband deployment obligations in Missouri, which knowledge is valuable to this Commission. As there is no requirement for USAC to inform this Commission of its findings, it remains unclear if the federal findings will be provided to state officials.

3. 20 CSR 4240-31.015.1(c) requires that any eligible telecommunications carrier (ETC) receiving ETC designation from the commission will – provide a copy to the manager of the commission’s Telecommunications Department of any finding by a state or federal authority that the company has violated universal service fund

program requirements. Staff now asks this Commission to order Aristotle to provide a copy of the Universal Service Administrative Company's findings in this docket regardless of the audit's conclusions. Such a directive will provide notice to the Commission of the final outcome of the audit, which it may not receive notice of from any other avenue.

**WHEREFORE**, Staff prays that the Commission will accept this *Motion*; will order Aristotle Unified Communications, LLC, to file the results of the Universal Service Administrative Company's audit of the Company; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

**/s/ Whitney Scurlock**

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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 22<sup>nd</sup> day of January, 2024, to all counsel of record.

**/s/ Whitney Scurlock**