

**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’S MOTION TO COMPEL ARISTOTLE
TO FILE USAC AUDIT RESULTS**

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

1. On January 22, 2024, Staff filed its *Motion to File USAC Audit Results* (“Motion”) in which Staff asked “... this Commission to order Aristotle to provide a copy of the Universal Service Administrative Company’s (“USAC”) findings in this docket ***regardless of the audit’s conclusion*** [emphasis added].” The next day, Aristotle Unified Communications, LLC (“Aristotle” or “Company”) filed *Aristotle’s Response to Staff’s Motion to File USAC Audit Results* stating that the Company does not object to Staff’s *Motion*.

2. On January 24, 2024, the Commission granted Staff’s *Motion* and ordered Aristotle to file the results of the USAC audit within 30 days of receipt of those results in its *Report and Order*.

3. On April 5, 2024, Aristotle made a filing with the Commission. This filing indicates USAC provided its audit findings to Aristotle on January 26, 2024.¹ To date, Aristotle has not provided a copy of USAC’s findings as ordered by the Commission.

¹ Aristotle’s attachment labeled “FCC LOI.pdf” on pages 31, 41, and 43 of this 59 page document mention USAC’s audit findings regarding Aristotle’s compliance in meeting the 40% broadband deployment obligations in Missouri.

WHEREFORE, Staff prays that the Commission will accept this *Motion*; will enforce its January 24, 2024 *Report and Order* and 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/ Ron Irving

Ron Irving

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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 11th day of April, 2024 to all counsel of record.

/s/Ron Irving