

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

In the Matter of the Application of Green Hills Area)
Cellular Telephone, Inc. d/b/a Green Hills)
Telecommunications Services for Expanded) **File No. CA-2024-0284**
Designation as an Eligible Telecommunications)
Carrier for Purposes of Receiving Federal and State)
Lifeline and Disabled Support)

STAFF'S RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, respectfully states as follows:

1. On April 3, 2024, Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills Telecommunications Services (“Green Hills Telecommunications Services” or “Applicant”) filed its application with the Public Service Commission (“Commission”); wherein, it requests expanded designation as an Eligible Telecommunications Carrier (ETC) for purposes of receiving federal Lifeline and state Lifeline and Disabled Support.

The Applicant’s request, if approved, would permit it to receive federal low-income and state low-income and disabled support to provide Lifeline and Disabled services to residents state-wide in Missouri.

2. The Applicant is registered as a Missouri Corporation with the Missouri Secretary of State. The Applicant is certificated by the Commission to provide local and non-switched local telecommunications services pursuant to File No. TA-98-380 and is a registered VoIP provider pursuant to File No. CA-2017-0040.

3. Commission rules 20 CSR 4240-31.014 and 20 CSR 4240-31.016 govern the specific Lifeline and Disabled Programs and 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. The Commission also has federal authority to grant ETC status to a company pursuant to 47 U.S.C. § 214(e)(2) and 47 C.F.R. § 54.201.

5. 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 the Applicant has met the federal requirements and the requirements of 20 CSR 4240-31.014, 20 CSR 4240-31.016, and should receive its expanded ETC designation.

6. Green Hills Telecommunications Services sought waiver of the 60-day notice requirement pursuant to the Commission's rule 20 CSR 4240-4.017. Staff recommends that the waiver be granted.

WHEREFORE, Staff recommends that the Commission approve Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills Telecommunications Services' request to expand the territory to state-wide for its designation as an eligible telecommunications carrier for the purpose of receiving federal low-income Lifeline support and Missouri USF support; that it grant waiver of the 60-day notice requirement; and that it grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Eric Vandergriff

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Attorney for the Staff of the
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 6th day of May, 2024.

/s/ Eric Vandergriff

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. CA-2024-0284

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

Subject: Staff's Recommendation to Green Hills Area Cellular Telephone, Inc.
d/b/a Green Hills Telecommunications Services' Request for
Expansion of Existing ETC Designation

Date: May 6, 2024

On April 3, 2024, Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills Telecommunications Services (Green Hills) filed an application for expansion of their designation as an Eligible Telecommunications Carrier (ETC).¹ The company is a certificated CLEC and registered IVoIP in Missouri.² Green Hills seeks to expand its ETC designation in order to provide federal and state Lifeline and Disabled discounts state-wide in Missouri.

Federal authority enables state commissions to grant ETC status to a company.³ Missouri's ETC application requirements are contained in existing Missouri Commission Rule 20 CSR 4240-31.016. Staff reviewed Green Hills' request for compliance with Missouri's rules as well as federal requirements. In Staff's opinion the company has adequately met all requirements. Consequently, Staff supports the Green Hills' application for expansion of its ETC status.

Staff recommends the Commission expand Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills Telecommunications Services' ETC territory to state-wide for the purpose of receiving federal low-income support and Missouri USF support.

¹ ETC status granted in Case No. CO-2003-0162.

² Case Nos. TA-98-380 and CA-2017-0040.

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