

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

In the Matter of the Application of New)
Florence Telephone, LLC d/b/a Rally)
Networks for Expanded Designation as an)
Eligible Telecommunications Carrier for)
Purposes of Receiving Federal and State)
Lifeline and Disabled Support)

File No. IA-2024-0333

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and submits its Recommendation as follows:

1. On May 6, 2024, New Florence Telephone, LLC d/b/a Rally Networks (“Rally Networks”) filed its Application for expanded designation as an Eligible Telecommunications Carrier (“ETC”) for purposes of receiving federal and state Lifeline and Disabled Support. Rally Networks seeks to expand its designation state-wide. Should its Application be approved, Rally Networks will offer voice and broadband internet access services, and qualifying subscribers will be eligible for federal and state Lifeline and Disabled support.

2. Rally Networks is certificated in the state of Missouri as an incumbent local exchange carrier (“ILEC”) and registered as an interconnected voice over internet protocol (“IVoIP”) services provider.

3. Commission rule 20 CSR 4240-31.016 governs the specific ETC requirements that each applicant must meet. 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 Rally Networks has met the requirements of 20 CSR 4240-31.016 and should be allowed to expand its ETC designation.

4. Rally Networks also 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 grant New Florence, LLC d/b/a Rally Networks' request to expand its eligible telecommunications carrier status to state-wide for the purpose of receiving federal and state Lifeline and Disabled Support; that it grant a waiver of the 60-day notice requirement; and that it grant such other and further relief as the Commission finds appropriate in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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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 4th day of June, 2024, to all counsel of record.

/s/ Mark Johnson

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IA-2024-0333

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

Subject: Staff's Recommendation to New Florence Telephone, LLC,
d/b/a Rally Networks Request for Expansion of Existing ETC Designation

Date: June 4, 2024

On May 6, 2024, New Florence Telephone, LLC, d/b/a Rally Networks (Rally Networks) filed an application for expansion of their designation as an Eligible Telecommunications Carrier (ETC).¹ The company is a certificated ILEC and registered IVoIP in Missouri.² Rally Networks 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 the Rally Networks' 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 Rally Networks' application for expansion of its ETC status.

Staff recommends the Commission expand New Florence Telephone, LLC, d/b/a Rally Networks' 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. TO-98-49.

² Case Nos. TA-88-54 and DA-2024-0287.

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