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October 31, 2024

Missouri Public Service Commission
c/o Nancy Dippell, Commission Secretary
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Northwest Missouri Cellular Limited Partnership (Case No. TO-2005-0466)
Notice of ETC Relinquishment

Dear Secretary Dippell:

Pursuant to 47 U.S.C. § 214(e)(4), 47 C.F.R. § 54.205, and 20 CSR 4240-31.015(4), Northwest Missouri Cellular Limited Partnership (the “Company” or “NWMC”), hereby notifies the Missouri Public Service Commission (“Commission”) of NWMC’s relinquishment of its Eligible Telecommunications Carrier (“ETC”) designation. NWMC requests the Commission issue an order approving the relinquishment effective as of January 31, 2025, which is more than 60 days from the date of this letter.

Introduction

NWMC was designated as an ETC by the Commission in 2006 to receive high-cost and Lifeline support from the federal Universal Service Fund.¹ NWMC seeks to relinquish its ETC designation throughout its entire Designated Area, and a list of the incumbent local exchange carrier (“ILEC”) wire centers where NWMC has been designated as an ETC is attached as Appendix A. The ETC designation has permitted NWMC to upgrade and expand its wireless network coverage in rural and underserved areas and to provide discounted service to qualifying low-income Missourians.

NWMC has entered into a transaction (the “Customer Referral Transaction”) to refer its mobile wireless customers to Cellco Partnership d/b/a Verizon Wireless (“Cellco”) from September 1, 2024 through January 31, 2025. As a result of the Customer Referral Transaction,

¹ Mo PSC Case No. TO-2005-0466.

NWMC will cease providing retail wireless service to end user customers as of January 31, 2025, but will continue to provide roaming service to the customers of other carriers. In conjunction with the Customer Referral Transaction, NWMC and Cellco are finalizing an agreement to transfer the majority of NWMC's wireless network assets and FCC licenses, but not NWMC's towers, to Cellco or one or more of its affiliates (collectively, "Verizon Wireless", and such transaction, the "Asset Sale"). The Asset Sale involves the assignment of NWMC's FCC licenses in the northwestern corner of the state, which assignment is subject to prior FCC approval. Upon consummation of the Asset Sale, NWMC will cease providing mobile wireless services entirely.

NWMC is voluntarily taking significant steps to mitigate the impact of relinquishment on its customers. Beginning in September of 2024, NWMC provided notice, via letter, to its customers regarding the impending termination of service (a copy of which is attached as Appendix B). NWMC plans to send another letter in December, 2024, reminding its customers of the impending termination of service. NWMC also will use multiple outreach methods to provide information to affected customers, including the small number of customers who are receiving Lifeline discounts, regarding available wireless alternatives. For example, NWMC will send reminder e-mails and texts to its customers through December 31, 2024. After December 31, 2024, NWMC will individually contact any remaining customers who have not changed service providers to urge them to do so by January 31, 2025, or risk the possibility of losing service after that date.

Although NWMC recommends that its customers switch to Verizon Wireless, NWMC's customers are free to obtain service from any of the numerous wireless carriers that offer service in the area. In general, NWMC's customers may keep their existing telephone numbers by porting their number to their new selected provider, including Verizon Wireless. NWMC anticipates that most customers will be able to retain their current mobile devices if they so choose. This, however, depends on the requirements and restrictions of the new provider and the wireless plans that the customers select. Customers will be advised to examine this when selecting a new provider. NWMC customers that select Verizon Wireless will be able to trade in their current device to Verizon Wireless or continue using their current device, depending on the device.

Discussion

Pursuant to § 214(e)(4) of the Act, the Commission "shall permit an eligible telecommunications carrier to relinquish its designation as such a carrier in any area served by more than one eligible telecommunications carrier." Prior to approving an ETC relinquishment, the Commission "shall require the remaining eligible telecommunications carrier or carriers to ensure that all customers served by the relinquishing carrier will continue to be served, and shall require sufficient notice to permit the purchase or construction of adequate facilities by any remaining eligible telecommunications carrier."

NWMC's relinquishment satisfies all applicable requirements. First, each of the areas to be relinquished pursuant to this Notice is currently served by at least one Commission-designated ETC. Besides NWMC, the areas in Appendix A (except the AT&T Missouri

Stanberry exchange) are served by an ILEC that has ETC status. As ETCs and telecommunications carriers, these companies are required to provide service upon reasonable request throughout these areas. In addition, multiple providers of wireless service have been designated as an ETC throughout Missouri for purposes of providing discounted telephone service to qualifying low-income consumers.² There is no need for the Commission to require any other ETC to purchase or construct additional facilities in order to serve NWMC's customers.

NWMC has provided ample notice that it is exiting the retail wireless business, including Lifeline service, and the areas in question are served by more than one ETC. Accordingly, NWMC's customers will continue to have available service options.

Conclusion

NWMC respectfully requests the Commission issue an order approving the relinquishment of its ETC designation in the areas listed in Appendix A, effective as of January 31, 2025.

Sincerely,

BRYDON SWEARENGEN & ENGLAND P.C.

By:


W.R. England

TE/sh

Enclosure

cc: John Van Eschen, Missouri PSC
Kari Salsman, Missouri PSC
Roger Bundridge, NWMC
Greg Whiteaker, counsel to NWMC

² See, e.g., TruConnect Communications, Inc. (File No. TA-2024-0238), IM Telecom, LLC, d/b/a Infiniti Mobile (File No. RA-2024-0197), DISH Wireless, LLC (File No. RA-2023-0381), AirVoice Wireless, LLC, d/b/a AirTalk Wireless (File No. RA-2022-0252), AmeriMex Communications Corp., d/b/a SafetyNet Wireless (File No. RA-2020-0386), Total Call Mobile, Inc. (File No. RA-2013-0348), and Nexus Communications, Inc., d/b/a Reachout Wireless (File No RA-2009-0375).

Appendix A – Relinquished Wire Centers

Alltel Missouri, d/b/a Windstream	ALBANY
Alltel Missouri, d/b/a Windstream	GRANT CITY
Alltel Missouri, d/b/a Windstream	ALLENDALE
Grand River Mutual Telephone Corp., d/b/a GRM Networks	BARNARD
Grand River Mutual Telephone Corp., d/b/a GRM Networks	CONCEPTION JUNCTION
Grand River Mutual Telephone Corp. d/b/a GRM Networks	DENVER
Grand River Mutual Telephone Corp., d/b/a GRM Networks	DARLINGTON
Grand River Mutual Telephone Corp., d/b/a GRM Networks	GENTRY
Grand River Mutual Telephone Corp. d/b/a GRM Networks	GRAHAM
Grand River Mutual Telephone Corp., d/b/a GRM Networks	NEW HAMPTON
Grand River Mutual Telephone Corp., d/b/a GRM Networks	PARNELL
Grand River Mutual Telephone Corp., d/b/a GRM Networks	RAVENWOOD
Grand River Mutual Telephone Corp., d/b/a GRM Networks	SHERIDAN
Holway Telephone Co., d/b/a Fastwyre	SKIDMORE
Holway Telephone Co., d/b/a Fastwyre	MAITLAND
IAMO Communications, Inc.	CLEARMONT
IAMO Communications, Inc.	ELMO
IAMO Communications, Inc.	WESTBORO
IAMO Communications, Inc.	BURLINGTON JCT
Iowa Telecommunications Services, Inc., d/b/a Iowa Telecom	SOUTH BRADDYVILLE
Oregon Farmers Mutual Telephone Co.	OREGON
Rock Port Telephone Co.	SOUTH HAMBURG
Rock Port Telephone Co.	WATSON
Rock Port Telephone Co.	ROCK PORT
Southwestern Bell Telephone, d/b/a AT&T Missouri	STANBERRY

Sprint Missouri, d/b/a Brightspeed	CRAIG
Sprint Missouri, d/b/a Brightspeed	FAIRFAX
Sprint Missouri, d/b/a Brightspeed	HOPKINS
Sprint Missouri, d/b/a Brightspeed	KING CITY
Sprint Missouri, d/b/a Brightspeed	MARYVILLE
Sprint Missouri, d/b/a Brightspeed	MOUND CITY
Sprint Missouri, d/b/a Brightspeed	PICKERING
Sprint Missouri, d/b/a Brightspeed	TARKIO

Appendix B - Customer Notice Letter



Dear NorthwestCell Customer,

NorthwestCell has worked relentlessly to provide you with the best service possible to connect you with what matters most. For over 35 years, we have been extremely proud of our accomplishments, and honored that you have chosen us to be your number one carrier.

As we assess the future of wireless and its complexities to truly provide you with the latest and most advanced technologies/benefits, Verizon, the nation's most reliable and most awarded network, plans to acquire select network assets from NorthwestCell, after which, NorthwestCell will no longer provide wireless service. As a result of this transaction, Verizon will become the preferred wireless service provider in Northwest Missouri. During the acquisition, we will assist you in transferring your service(s).

Verizon not only provides you with extra fast service, but you'll also gain access to tons of perks and discounts not available to anyone else. **Starting September 23, 2024, through December 31, 2024, Verizon is exclusively offering Northwest Cell customers an additional \$50 bill credit per line* and a waived activation fee to transfer service.** To find out more about Verizon's national —offers, please go to go.vzw.com/unlimitedplan or call 888-304-0990.

To transition to Verizon Wireless starting September 23rd, see the NorthwestCell location or Event Center:

NorthwestCell	1218 S. Main	Maryville, MO	Mon-Sat, 9A – 7P
Rose Hill Acres Event Center**	105 S. Main	Maryville, MO	Sept 23 (Mon)-Sept 27 (Fri) 9A-7P

Please note: NorthwestCell is working diligently with Verizon to make your transfer easy while allowing you to keep your number. Your NorthwestCell wireless service will be discontinued on December 31, 2024. **It is important that you transition your account before December 31, 2024, to avoid a disruption to your service.**

We will be communicating frequently over the next couple of months to make sure your experience is positive. You can always visit www.nwmcell.com for updates. As a valued customer, we will do our very best to ensure a smooth service transition.

Thank you for being a loyal NorthwestCell customer. It has been a privilege to serve you!

Regards,

The NorthwestCell Team

*This credit will be applied within 2-3 business cycles.

**To assist with wait times, the Verizon team will have additional staff at the Rose Hill Acres Event Center to help process transactions and assist in transferring your service.

Appendix B - Customer Notice Letter

FAQs

1. Q What service does this affect?
A This transition affects both postpaid & prepaid mobile/cellular services from NorthwestCell.
2. Q When will NorthwestCell stop activating new customers and stop upgrading phones for current customers?
A We will stop activating new customers and stop upgrading phones for current customers on September 16, 2024.
3. Q When will we be able to switch to Verizon?
A You can transfer your service to Verizon beginning September 23, 2024.
4. Q What promotions are being offered by Verizon to NorthwestCell customers?
A Verizon is exclusively offering NorthwestCell customers an additional \$50 bill credit per line* and a waived activation fee to transfer service. To find out more about Verizon's national offers, please go to go.vzw.com/unlimitedplan or call 888-304-0990.
5. Q Will I be able to keep my phone and use it if I switch to Verizon?
A Yes, if you have a newer model smartphone (VoLTE capable) there is a high likelihood that your device will work on Verizon, and you will be able to keep your device. However, if you have any outstanding balance(s) on your device(s) it will need to be paid to NorthwestCell.
6. Q Will I be responsible for paying my final bill for any balance due for equipment and monthly service with NorthwestCell if I move to Verizon or any other carrier?
A Yes, your monthly bill for services will continue to come from NorthwestCell until you transition to another service provider. You will continue to receive a monthly bill if you have an outstanding balance with NorthwestCell.
7. Q Will I be able to keep my NorthwestCell rate plan if I move to Verizon?
A No, Verizon will have their own rate plans and special offers.
8. Q Will I be able to keep my wireless phone number?
A Yes, in most cases you can take your number to another carrier (port your number). If you port your number to a new carrier – NorthwestCell will automatically disconnect your service. If you obtain a new number, you must call NorthwestCell to have your service disconnected.
9. Q What can I do to get prepared to transfer my service before visiting a store?
A Bring in your most recent bill or have your account number readily available. If you're an iPhone user, please turn off "Find My iPhone" and know your Apple ID and password. For Android devices, please back up your device to Google Photos or Dropbox. Please know your Google username and password. Agents will be available to make sure contacts, videos, and photos are transferred properly.
10. Q Am I being moved to Verizon as a customer?
A NorthwestCell will not automatically move you to another provider. You must initiate the move to another carrier before December 31st, 2024.
11. Q Do I have to switch my service to Verizon?
A No, you have the option to move to another provider, but Verizon will have exciting, and exclusive offers for NorthwestCell customers.
12. Q What will happen to the NorthwestCell retail office?
A NorthwestCell will be closing our offices and agent locations beginning in January 2025. We will be available with any questions you may have through at least February 15, 2025, by calling 800-331-6341, or by e-mail, monthlybill@nwmcell.com.