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November 14, 2024

Nancy Dippell
Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
Jefferson City, Missouri 65102-0360

Re: Relinquishment of Designation as an Eligible Telecommunications Carrier of Aristotle Unified Communications Inc

Dear. Judge Dippell:

Pursuant to the rules of the Missouri Public Service Commission (the “Commission”),¹ Section 214(e)(4) of the Communications Act of 1934, as amended (the “Act”), and the rules of the Federal Communications Commission (“FCC”),² Aristotle Unified Communications Inc (“Aristotle” or “Company”) submits this Letter seeking the relinquishment of its designation as an Eligible Telecommunications Carrier (“ETC”) in the service area granted to the Company in Docket No. TA 2019-0147.³ In Docket No. TA 2019-0147, Aristotle was designated an ETC for Purposes of Receiving Support from the FCC Connect America Fund – Phase II.

All correspondence relating to this Letter should be addressed to:

Thomas H. Rowland

¹ 20 CSR 4240-31.015(4) (“The relinquishment of ETC status is accomplished by providing a letter signed by an authorized company official or representative at least sixty (60) days prior to relinquishing ETC status demonstrating compliance with 47 U.S.C. section 214(e)(4).”)

² 27 CFR §§ 54.101-54.207.

³ See *In the Matter of the Application of Aristotle Unified Communications LLC for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Support from the FCC Connect America Fund – Phase II*, File No. TA 2019-0147, Order (Jan. 3, 2019).

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On July 16, 2024, Aristotle and Wisper ISP, LLC (“Wisper”) entered into an Assignment and Assumption Agreement (“Agreement”). Pursuant to the Agreement, and subject to all necessary FCC and state approvals, Wisper agreed to acquire the Assigned Census Blocks and related assets from Aristotle and to assume the CAF obligations thereunder. In connection with the Transaction, Aristotle will convey to Wisper assets it acquired for the CAF-supported deployment in the Assigned Census Blocks, including engineering plans, equipment and facilities, unexpended CAF support and the right to receive future CAF support.⁴ Related to the Agreement, on September 25, 2024, this Commission entered an Order granting Expanded Designation as an Eligible Telecommunications Carrier to Wisper ISP, LLC.⁵ That Order designates Wisper ISP, LLC as an ETC for the Service Area granted to Aristotle in Docket No. TA 2019-0147.

⁴ A list comprising the census block service area to be relinquished by Aristotle is attached as Exhibit 1.

⁵ *In the Matter of Wisper ISP, LLC's Application for Designation as an Eligible Telecommunications Carrier in an Expanded Service Area*, File No. DA-2025-0055, Order (Sept. 25, 2024).

On July 17, 2024, Aristotle and Wisper filed before the FCC a Joint Application for Consent to Assign Domestic Section 214 Authorization.⁶ In the Joint Application, the parties requested FCC authorization to assign Aristotle's domestic Section 214 authorization for its State of Missouri Connect America Fund Phase II (Auction 903) ("CAF") locations (Study Area Code 429044) to Wisper. Thus, pursuant to the Joint Application, Wisper will acquire assets Aristotle obtained as a CAF recipient for all of the census blocks in Missouri for which it is authorized to receive CAF support ("Assigned Census Blocks"), and Wisper will assume the deployment, performance and other obligations for the Assigned Census Blocks. On October 21, 2024, the FCC conditionally granted the Joint Application.⁷ The FCC conditions have been met, so it is now appropriate for this Commission to enter an Order relinquishing Aristotle's Missouri ETC authorization.

Pursuant to 47 U.S.C. Section 214(e)(4), a state regulatory 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." The ETC seeking relinquishment must provide advance notice to the state commission. The subscribers served by the relinquishing ETC must continue to be served by an ETC. Finally, to the extent additional facilities are required to serve any of the relinquishing ETC's subscribers, sufficient notice must be provided to ensure that the construction of any additional facilities necessary to serve the relinquishing ETC's subscribers can be timely completed.

⁶ *In the Matter of the Joint Application of Aristotle Unified Communications Inc, Assignor and Wisper ISP, LLC, Assignee for Assignment of Domestic Section 214 Authorization Pursuant to the Communications Act of 1934, as Amended*, WC Docket No. 24-219 (July 17, 2024).

⁷ See: <https://docs.fcc.gov/public/attachments/DA-24-1088A1.pdf>


As a result of the Wisper's expanded designation as an ETC in DA-2025-0055, all the census blocks being relinquished by Aristotle will be served by Wisper ISP, LLC as an ETC. Aristotle seeks to relinquish ETC designation in the identified census blocks prior to the service area being fully built-out. Pursuant to the FCC's CAF Phase II build-out rules for Auction 903, Aristotle has not fully built-out facilities within its ETC Service Area. Presently, one (1) customer is being provided Lifeline service in the service area. However, pursuant to the FCC's Order and this Commission's Order in DA-2025-0055, that customer will be able to continue to receive ETC service from Wisper ISP, LLC or another ETC of the customer's choosing.

Consistent with 47 U.S.C. §214(e)(4), Aristotle is filing this Application in advance of its requested date of relinquishment. Pursuant to the FCC Order and this Commission's Order in DA-2025-0055, Wisper ISP will fully build-out the Service Area pursuant to the terms and conditions of the FCC's CAF Phase II rules. The one (1) customer presently served by Aristotle was provided notice starting sixty (60) days prior to the proposed effective date.

As described herein, Aristotle has met the conditions of 47 U.S.C. §214(e)(4) for relinquishment of its ETC service area in Missouri. Therefore, Aristotle respectfully requests an Order from this Commission relinquishing its ETC service area in Missouri.

Respectfully submitted,

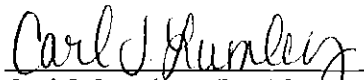
ARISTOTLE UNIFIED COMMUNICATIONS INC

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Exhibit 1

State	County	Block Group	Locations	Assigned Support
MO	Howell	290910901002	1	\$ 547.11
MO	Howell	290910901003	2	\$ 911.56
MO	Howell	290910903001	5	\$ 2,735.87
MO	Howell	290910903002	2	\$ 646.99
MO	Howell	290910903003	6	\$ 2,494.93
MO	Howell	290910904001	6	\$ 1,444.40
MO	Howell	290910904002	11	\$ 1,189.59
MO	Howell	290910904003	3	\$ 1,337.66
MO	Howell	290910904004	23	\$ 4,817.74
MO	Howell	290910906001	1	\$ 64.70
MO	Howell	290910906002	26	\$ 8,229.78
MO	Howell	290910906003	48	\$ 16,261.97
MO	Howell	290910906004	4	\$ 457.34
MO	Oregon	291494801002	66	\$ 34,827.55
MO	Oregon	291494801003	14	\$ 2,351.99
MO	Oregon	291494801004	11	\$ 6,018.85
MO	Oregon	291494802001	21	\$ 10,986.23
MO	Oregon	291494803001	65	\$ 27,746.00
MO	Oregon	291494803002	4	\$ 1,783.65
MO	Oregon	291494803003	32	\$ 8,836.18
MO	Ozark	291534701001	44	\$ 24,076.00
MO	Ozark	291534701002	38	\$ 19,832.00
MO	Ozark	291534701003	49	\$ 16,865.00
MO	Ozark	291534701004	2	\$ 912.00
MO	Ozark	291534702001	95	\$ 35,752.00
MO	Ozark	291534702002	94	\$ 37,263.00
MO	Ozark	291534702003	78	\$ 25,430.00
MO	Ozark	291534702004	31	\$ 4,757.00
MO	Ozark	291534702005	6	\$ 1,578.00
			788	\$ 300,155.09