

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

In the Matter of the Application of Northeast Missouri)
Rural Telephone Company d/b/a NEMR for)
Expanded Designation as an Eligible) **File No. IA-2025-0148**
Telecommunications Carrier for Purposes of)
Receiving Federal and State Lifeline and)
Disabled Support)

STAFF RECOMMENDATION

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

1. On November 6, 2024, Northeast Missouri Rural Telephone Company d/b/a NEMR (“NEMR” or “Company”) filed an Application for expanded designation as an Eligible Telecommunications Carrier (“ETC”) in order to receive federal low-income and Missouri Universal Service Fund (“Missouri USF”) support. NEMR seeks to expand its designation state-wide.

2. The Company is certificated in the state of Missouri as an incumbent local exchange carrier, ILEC, a competitive local exchange carrier, CLEC, and registered as an interconnected voice over internet protocol (VoIP) 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 NEMR has met the requirements of 20 CSR 4240-31.016 and should be allowed to expand its ETC designation.

4. NEMR 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 Northeast Missouri Rural Telephone Company d/b/a NEMR request to expand its designation as an eligible telecommunications carrier to state-wide for the purpose of receiving federal low-income and Missouri USF 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.¹

Respectfully submitted,

/s/ 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 6th day of December, 2024, to all counsel of record.

/s/Ron Irving

¹ The Commission's November 7, 2024 *Order Directing Notice, Setting Intervention Deadline, and Directing Staff to File a Recommendation* erroneously suggests the company offers wireless service. Staff recommends the Commission's subsequent order(s) should not attempt to make such a service distinction but simply acknowledge the Company's ETC territory is expanded to state-wide.

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IA-2025-0148

From: Kari Salsman, Senior Research/Data Analyst
John Van Eschen, Regulatory Compliance Manager
Telecommunications Department

Subject: Staff's Recommendation to Approve Northeast Missouri Rural Telephone Company d/b/a NEMR's Request for Expansion of Existing ETC Designation

Date: December 6, 2024

On November 6, 2024, Northeast Missouri Rural Telephone Company d/b/a NEMR (NEMR) filed an application for expansion of their designation as an Eligible Telecommunications Carrier (ETC).¹ The company is a certificated ILEC and CLEC and is a registered IVoIP in Missouri.² NEMR 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 company's 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 company's application for expansion of their ETC status.

Staff recommends the Commission expand NEMR's ETC territory to state-wide for the purpose of receiving federal low-income support and Missouri USF support.

Appendix A

¹ ETC status granted in Case No. TO-98-49.

² Case Nos. TA-88-53, CA-2021-0122 and DA-2020-0413. Name changed in Case Nos. IN-2021-0181, CN-2021-0183, DN-2021-0184, TN-2022-0348 & DN-2022-0349.

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