

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

In the Matter of the Application of Mark)
Twain Communications Company for)
Expanded Designation as an Eligible)
Telecommunications Carrier for Purposes)
of Receiving Federal and State Lifeline)
and Disabled Support)

File No. CA-2025-0187

STAFF RECOMMENDATION

COMES NOW Staff of the Missouri Public Service Commission (“Staff”),
by and through counsel, and for its *Recommendation* in this matter hereby states:

1. On December 18, 2024, Mark Twain Communications Company (“Mark Twain”) filed its application with the Missouri Public Service Commission (“Commission”) requesting that the Commission issue an order expanding Mark Twain’s designation as an eligible telecommunications carrier (ETC) in order to receive federal low-income and Missouri Universal Service Fund (Missouri USF) support state-wide.

2. Mark Twain is presently certificated in the state of Missouri as a competitive local exchange carrier (CLEC) pursuant to TA-98-305.

3. Commission rule 20 CSR 4240-31.016 governs the specific eligible telecommunications carrier requirements that each applicant must meet.¹ Applications must also comply with 20 CSR 4240-2.060(1) and shall be verified by oath as to the truthfulness contained in the application by an officer or director of the applicant.²

4. Staff conducted an investigation and has provided a memorandum attached to this pleading as Appendix A. Staff’s memorandum outlines the reasons why Staff

¹ 20 CSR 4240-31.016. ETC Application Requirements identifies application requirements for companies seeking ETC status for the purpose of receiving federal USF support.

² Each applicant must provide: (A) its legal name, legal entity or other business organization, and contact information; (B)–(F) required information such as certificates of good standing and/or references to previously filed information, if

believes Mark Twain has met the requirements of 20 CSR 4240-31.016 and should receive expanded ETC designation.

5. Mark Twain 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 respectfully requests that the Commission accept this *Recommendation*, approve Mark Twain's 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, waive the 60-day notice requirement, and grant any other just relief.³

Respectfully submitted,

/s/ Eric Vandergriff

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current; (H) brief business statement; (I) a designated agent for communications if not legal counsel; (J) membership list if unincorporated or other entity created by statute; (K) any outstanding or recent legal actions or judgments within three (3) years of the date of the application; (L) that no annual report or assessment fees are overdue; and (M) a verified affidavit under oath signed by an authorized representative.

³ The Commission's December 18, 2024, *Order Directing Notice, Setting Intervention Deadline, and Directing Staff to File a Recommendation* includes language that might be interpreted as referencing the Company's wireless services. However, Mark Twain is a landline telecommunication company, not wireless.

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 16th day of January, 2025.

/s/ Eric Vandergriff

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. CA-2025-0187

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

Subject: Staff's Recommendation to Approve Mark Twain Communications
Company's Request for Expansion of Existing ETC Designation

Date: January 16, 2025

On December 18, 2024, Mark Twain Communications Company (Mark Twain) filed an application for expansion of their designation as an Eligible Telecommunications Carrier (ETC).¹ The company is a certificated Competitive Local Exchange Carrier (CLEC) in Missouri.² Mark Twain 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 Mark Twain'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 Mark Twain's application for expansion of their ETC status.

Staff recommends the Commission expand Mark Twain's 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. TA-98-305.

² Case No. TA-2000-591.

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