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February 17, 2025

**VIA ELECTRONIC FILING**

Nancy Dippell  
Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street  
P.O. Box 360  
Jefferson City, MO 65102

**Re: Partial Relinquishment of Designation as an Eligible  
Telecommunications Carrier; Case No. \_\_\_\_\_**

Dear Judge Dippell:

Pursuant to the rules of the Missouri Public Communications Commission (the “Commission”)<sup>1</sup>, Section 214(e)(4) of the Communications Act of 1934, as amended (the “Act”),<sup>2</sup> and the rules of the Federal Communications Commission (“FCC”)<sup>3</sup>, Co-Mo Comm, Inc. d/b/a Co-Mo Connect (“Co-Mo Connect” or “Company”) submits this letter notice seeking the partial relinquishment of its designation as an Eligible Telecommunications Carrier (“ETC”) solely in the census blocks identified in **Attachment A**, effective April 25, 2025. Co-Mo Connect was granted ETC designation in these census blocks in Docket Nos. DA-2025-0054<sup>4</sup> and DA-2021-0196.<sup>5</sup>

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<sup>1</sup> 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).”)

<sup>2</sup> 47 U.S.C. § 214(e)(4).

<sup>3</sup> 47 CFR § 54.205 *et seq.*

<sup>4</sup> See *In the Matter of the Application of Co-Mo Comm, Inc. d/b/a Co-Mo Connect to Expand its Eligible Telecommunications Carrier Designation to Participate in the Missouri Universal Service Fund*, File No. DA-2025-0054, Order (Sept. 25, 2024).

<sup>5</sup> See *In the Matter of the Application of Co-Mo Comm, Inc. d/b/a Co-Mo Connect for Expanded Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934, as Amended*, File No. DA-2021-0196, Order (Feb. 24, 2021). Co-Mo Connect was initially designated an ETC by the Commission in Missouri PSC Case No. RA-2019-0088. However, none of the census blocks where Co-Mo Connect seeks to partial relinquish ETC designation were part of Co-Mo Connect’s initial ETC designation order. See *In the Matter of the Petition of Co-Mo Comm, Inc. for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(5) of the Communications Act of 1934, as Amended*, File No. RA-2019-0088, Order (Nov. 15, 2018); see also *In the Matter of the Petition of Co-Mo Comm, Inc. for Designation as an Eligible Telecommunications*

All correspondence relating to this Letter should be addressed to:

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On June 28, 2024, Co-Mo Connect filed a Notice of Election of Partial Default of its Rural Digital Opportunity Fund Phase I (“RDOF”) Auction obligations with the Federal Communications Commission (“FCC”).<sup>6</sup> Co-Mo Connect explained to the FCC that escalating construction costs that started during the COVID-19 pandemic is the cause for its partial RDOF default.<sup>7</sup> A list of the defaulted census blocks is included as **Attachment A**.

On July 10, 2024, the FCC’s Wireline Competition Bureau released a Public Notice acknowledging Co-Mo Connect’s partial RDOF default,<sup>8</sup> and making the defaulted census blocks eligible for other broadband funding.

Pursuant to 47 U.S.C. § 214(e)(4) and Section 54.205(a) of the FCC’s rules, 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.”<sup>9</sup> An ETC seeking relinquishment must provide advance notice to the state commission of such relinquishment. 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. The areas where Co-Mo Connect seeks to relinquish ETC designation are served by other ETCs, including DISH Wireless, L.L.C., TracFone Wireless, Inc., Telrite Corporation, Easy Telephone Service Company, YourTel America, Inc., Global Connection Inc. of America and i-wireless, LLC.

Co-Mo Connect has not built out or launched broadband service in the census blocks where it seeks to relinquish ETC designation and does not have any fiber customers in the proposed ETC relinquished area. Therefore, Co-Mo Connect’s partial ETC relinquishment will not adversely affect any Co-Mo Connect subscribers and the subscriber notification requirement is, in this case, not necessary.

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*Carrier Pursuant to Section 214(e) (5) of the Communications Act of 1934, as Amended*, File No. RA-2019-0088, Order Correcting Order (Nov. 21, 2018).

<sup>6</sup> See *Rural Digital Opportunity Fund*, WC Docket No 19-126, AU Docket No. 20-34, Notice of Election of Partial RDOF Default (June 28, 2024).

<sup>7</sup> *Id.* at 1.


<sup>8</sup> See *Rural Digital Opportunity Fund*, DA 24-669, Public Notice (July 10, 2024).

<sup>9</sup> 47 U.S.C § 214(e)(4).

Consistent with 47 U.S.C. § 214(e)(4) and Section 54.205(a) of the FCC's rules, Co-Mo Connect is filing this letter notice in advance of the requested date of partial ETC relinquishment, April 4, 2025.

Co-Mo Connect meets the requirements for the partial relinquishment of its ETC designation area in Missouri in the census blocks identified in **Attachment A** and respectfully requests an Order from this Commission permitting it to partially relinquish its ETC designation area in Missouri in the census blocks identified in **Attachment A**.

Respectfully submitted,

By:   
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## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on February 17, 2025, to the following:

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/s/ Megan E. McCord