

BRUCE E. BEARD Admitted in Illinois & Missouri bbeard@CinnamonMueller.com 1714 Deer Tracks Trail Suite 230 St. Louis, MO 63131

Direct: 314-394-1535 Main: 314-462-9000 Fax: 314-394-1538

February 21, 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:** Relinquishment of Designation as an Eligible Telecommunications Carrier & Cancellation of Interconnected Voice over Internet Protocol Registration; 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"), and the rules of the Federal Communications Commission ("FCC"), yondoo Broadband, LLC ("yondoo") submits this letter notice seeking the relinquishment of its designation as an Eligible Telecommunications Carrier ("ETC") in the census blocks identified in Attachment A, and cancellation of its Interconnected Voice Over Internet Protocol Registration ("iVoIP"), both effective April 30, 2025. yondoo was granted ETC designation in these census blocks in Docket No. DA-2021-0258.<sup>2</sup> yondoo was authorized to provide iVoIP services in Docket DA-2021-0256<sup>3</sup>.

All correspondence relating to this letter should be addressed to:

Bruce E. Beard Cinnamon Mueller 1714 Deer Tracks Trail-Suite 230 St. Louis, MO 63131

<sup>2</sup> In the Matter of the Application of yondoo Broadband, LLC for Designation as an Eligible Telecommunications Carrier in the State of Missouri, DA-2021-0258, Order, March 31, 2021.

<sup>3</sup> In the Matter of the Application of yondoo Broadband, LLC for Registration to Provide Interconnected Voice over Internet Protocol Service, DA-2021-0256, Order, February 17, 2021.

<sup>&</sup>lt;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. 214(e)(4). 20 CSR 4240-28.011(3) (Cancelling a certificate of service authority or registration may be accomplished by filing a letter signed by a company official into EFIS that identifies when and which specific certificate, registration, and any applicable tariffs should be cancelled.)

Phone: 314-394-1535 E-mail: <u>bbeard@cinnamonmueller.com</u>

yondoo sold its facilities in Missouri, including those within the designated census blocks to Skybeam LLC, d/b/a Rise Broadband ("Rise Broadband"), effective November 1, 2024. Rise Broadband is registered to provide iVoIP services throughout the state of Missouri and Rise Broadband continued to provide iVoIP services without interruption over the facilities.<sup>4</sup> yondoo is no longer providing iVoIP services in the state of Missouri.

yondoo requested and was granted ETC status by the Commission as part of its efforts to obtain funding through the Rural Development Opportunity Fund ("RDOF"). yondoo did not receive the RDOF funding and has not drawn on the federal Universal Service Fund or the Missouri Universal Service Fund for support in Missouri. Accordingly, the relinquishment of yondoo's ETC authority will have no impact as support was not being drawn and Rise Broadband continued service to existing customers.

Pursuant to 47 U.S.C. § 214(e)(4):

A State 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. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission . . . of such relinquishment. Prior to permitting a telecommunications carrier designated as an eligible telecommunications carrier to cease providing universal service in an area served by more than one eligible telecommunications carrier to cease providing universal service in an area served by more than one 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.

The relinquishment of yondoo's designation will not result in a loss of service as Rise Broadband continues service to the customers. Further, the areas are already built out and served by AT&T and Centurylink, both with Lifeline programs, and various wireless ETC's who have been designated as ETCs by the Commission, including Tracfone Wireless, Inc.<sup>5</sup> and Dish Wireless, L.L.C.<sup>6</sup> Thus, the requirement of at least one ETC in the area being relinquished is met.

<sup>&</sup>lt;sup>4</sup> In the Matter of the Application of Skybeam Colorado LLC d/b/a Rise Broadband for Registration to Provide Interconnected Voice over Internet Protocol Services, DA-2024-0355, Registration, June 12, 2024.

<sup>&</sup>lt;sup>5</sup> In the Matter of the Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Lifeline and Link Up Service to Qualified Households, Case No. TA-2009-0327, Order, August 26, 2009.

<sup>&</sup>lt;sup>6</sup> In the Matter of DISH Wireless, LLC Application for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Providing Lifeline Service to Qualifying Customers, RA-20223-0381, Order, June 22,2023.

Consistent with 47 U.S.C. § 214(e)(4) and Section 54.205(a) of the FCC's rules, yondoo is filing this letter notice in advance of the requested date of ETC relinquishment of April 30, 2025. Consistent with Commission rules, yondoo is also filing this letter for cancellation of its registration to provide iVoIP services as of April 30, 2025

yondoo meets the requirements for the relinquishment of its ETC designation area in Missouri and respectfully requests an Order from this Commission permitting it to relinquish its ETC designation area in Missouri and an Order recognizing the cancellation of its registration to provide iVoIP services in Missouri, both effective as of April 30, 2025.

If you have any questions, please let us know.

Sincerely,

Mens E Kund

Bruce E. Beard Attorney for yondoo Broadband, LLC Mo Bar #35171

**Company Verification** 

I, Robert M. Steffen, state that I am Vice-President of Finance for yondoo Broadband, LLC, that I have read the and verify the above letter and request that yondoo's designation as an Eligible Telecommunications Carrier be relinquished, and its registration as Interconnected Voice Over Internet Protocol service provider be cancelled, both effective April 30, 2025.

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Vice-President of Finance / yondoo Broadband, LLC

CC: Robert M. Steffen

## Attachment A

Census Blocks

292214603004 291138101002