

In the Matter of the Application of Boycom )  
Cablevision, Inc. for Designation as an Eligible ) Case No. \_\_\_\_\_  
Telecommunications Carrier in the State of )  
Missouri )

## I. INTRODUCTION

Boycom Cablevision, Inc., (“Boycom”) by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”)<sup>2</sup>, and the rules and regulations of the Missouri Public Service Commission (“Commission”), including 20 CSR 4240-31.016, and 20 CSR 4240-2.060 hereby submits this Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri.

As demonstrated in this Application, Boycom meets all state and federal requirements for ETC designation, and, as shown by the description herein of Boycom's voice and broadband deployment projects, designating Boycom as an ETC in the proposed areas would advance the goals of universal service and is in the public interest.

All correspondence, communication, pleadings, notices, orders, and decisions relating to this Application should be addressed to:

<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101 – 54.207.

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With a copy to:

Bruce E. Beard  
Cinnamon Mueller  
Attorney for Boycom Cablevision, Inc.  
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Phone : (314) 394-1535  
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## **II. BOYCOM'S SERVICE OFFERING**

Boycom is a Missouri corporation established in 1993 that operates in southeast Missouri. Its principal office is located at 3467 Township Line Road, Poplar Bluff, Missouri 63901. Boycom does not operate in any other state. Boycom is registered with the Missouri Secretary of State to do business in Missouri and includes its Missouri Certificate of Good Standing as **Exhibit A**. Boycom does not currently receive universal service funding, other than Rural Healthcare funding. Boycom's current ownership structure of individuals owning 10% or more of the company is identified on **Exhibit B**. Key personnel exerting control over the applicant's day-to-day operations are identified on **Exhibit C**. Boycom provides cable television, broadband Internet access service ("BIAS") and interconnected Voice over Internet Protocol ("VoIP") services in rural southeast Missouri. Boycom currently provides Internet speeds of up to 100 Mbps on its hybrid fiber coaxial plant and up to 1 gig on its fiber-to-the-home plant. Boycom's website containing information about the company's services and rates is at <https://www.boycom.com>. Attached as **Exhibit D** is an affidavit verified under oath by an authorized officer of the corporation.

### III. REQUIREMENTS FOR DESIGNATION AS AN ETC

Section 254(e) of the Act provides that “only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific federal universal service support.” Section 214(e)(2) of the Act authorizes state commissions, such as the Commission, to designate ETC status for federal universal service purposes and authorizes the Commission to designate wireline ETCs.<sup>3</sup> Section 214(e)(1) of the Act and Section 54.201(d) of the FCC’s rules provide that applicants for ETC designation must be common carriers that will offer all of the services supported by universal service, either using their own facilities or a combination of their own facilities and the resale of another carrier’s services.<sup>4</sup> Applicants also must commit to advertise the availability and rates of such services.<sup>5</sup> The requirements are codified by the Commission in 20 CSR 4240-31.016.

Pursuant to 20 CSR 4240-2.060 and 20 CSR 4240-31.016 all applications for ETC designation are to include the following summarized information<sup>6</sup>:

1. Description of service applicant will offer;
2. Identification of the applicant’s proposed service area;
3. Explanation of how applicant will offer services using its own facilities or combination of its own facilities or resale;
4. Statement certifying that applicant will advertise availability of service and its price, using media of general distribution;
5. Certification that applicant will comply with applicable Federal service requirements;

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<sup>3</sup> Federal-State Joint Board on Universal Service, First Report and Order, 12 FCC Rcd 8776, at 8858-59 ¶ 145.

<sup>4</sup> See 47 U.S.C. 214(e)(1)(A).

<sup>5</sup> See 47 U.S.C. 214(e)(1)(B).

<sup>6</sup> See 20 CSR 4240.130.1

6. Demonstration of the applicant's ability to remain functional in emergency situations, including description of back-up power, and ability to manage emergency situations;
7. Statement that applicant will satisfy applicable consumer protection, consumer privacy, and service quality standards.
8. Description of rates, terms and conditions of proposed voice telephony service to be supported as Lifeline or Disabled services;
9. Explanation of how applicant intends to provide service through the proposed service area, including areas where the applicant lacks facilities or network facilities;
10. Description of how applicant will ensure service will be provided in a timely manner to requesting customers;
11. Demonstration that applicant is financially viable and technically capable of providing voice telephony service;
12. Description of how, if at all, applicant will provide access to directory assistance, operator services and interexchange services;
13. Further Certifications Required Under the Commission's Rules in 20 CSR 4240-2.060;
14. Elements for participation in Lifeline or Disability program;
15. Certifications of Compliance;
16. Federal High Cost-Support Compliance;
17. Ownership Information;
18. Certification that Boycom is compliant with contribution obligations to the Federal USF;
19. Certification that Boycom commits to solely conduct business under name granted for ETC status.

20. Certification concerning fraud pursuant to 20 CSR 4240-31.016(2)(B)(4); and

21. Certification of compliance with 20 CSR 4240-31.016(2)(B)(6).

#### **IV. BOYCOM SATISFIES THE APPLICABLE REQUIREMENTS FOR DESIGNATION AS AN ETC**

##### **1. Description of service.**

Boycom offers, and will offer, upon designation as an ETC in Missouri, all the services and functionalities required by 20 CSR 4240-31.015, Section 45.101(a)(1)-(9) and Section 54.202(a) of the FCC's Rules.<sup>7</sup>). Boycom currently offers hybrid fiber-coaxial ("HFC") and fiber Internet access service and interconnected VoIP service to its subscribers. Boycom is registered as an interconnected VoIP provider in the state of Missouri. All Internet services meet the FCC definition of Broadband (i.e., 100 Mbps download/20 Mbps upload).

##### **2. Boycom requests ETC designation within its service area in Missouri.**

Boycom requests ETC designation for its service area which includes the communities and surrounding areas of Poplar Bluff, Doniphan, Van Buren, Mill Spring, Piedmont, Patterson Wappapello, Missouri.

##### **3. Boycom will offer services using its own facilities or a combination of its own facilities and resale.**

Boycom will use its own facilities. Boycom has deployed HFC and fiber-network and has partnered with Momentum Telecom to offer interconnected VoIP services over its network. Boycom actively maintains and expands its own network infrastructure to provide services directly to customers within its service area. Boycom clearly informs customers about whether a

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<sup>7</sup> 47 C.F.R. § 54.101(a)

service is provided through its own network or via resale, (e.g. Momentum Telecom) including any potential differences in pricing or service quality.

Boycom regularly reviews its network coverage and resale agreements to ensure continued adherence to the Act's requirements and to address any gaps in service availability.

Boycom will advertise the availability of the supported services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services. Boycom agrees to comply with all form and content requirements, if any, promulgated by the FCC and the Commission in the future as required of all designated ETCs.

**4. Boycom will advertise the availability of services and its price, using media of general distribution.**

Boycom advertises its services using many platforms, including Boycom's website, Facebook, press releases, and digital marketing campaigns. Pricing and availability information can be found at <https://www.boycom.com/index.php>.

**5. Boycom will comply with applicable Federal service requirements.**

Boycom certifies that it will comply with the service requirements applicable to the support that it receives.<sup>8</sup>

**6. Boycom will have the ability to remain functional in emergency situations.**

Boycom certifies that its HFC and fiber optic network will have the ability to remain functional in emergency situations, will have a reasonable amount of back-up power to ensure functionality without an external power source, will be able to reroute traffic around damaged facilities, and will be capable of managing traffic spikes resulting from emergency situations.<sup>9</sup>

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<sup>8</sup> 47 C.F.R. § 54.202(a)(1)(i).

<sup>9</sup> 47 C.F.R. § 54.202(a)(2).

Boycom's HFC and fiber optic network will support telephone service using VoIP technology and will support all phone features, including E-911 services.

**7. Boycom will satisfy applicable consumer protection, consumer privacy, and service quality standards.**

Boycom will satisfy all consumer protection and service quality standards as provided in 47 C.F.R. § 54.202(a)(3), and all applicable state specific consumer protection and service quality standards. Boycom follows applicable federal and state service quality and consumer protection rules.

Boycom complies with quality of service requirements including monitoring and reporting service quality metrics where required. Boycom has implemented numerous consumer protection measures to protect customer information. For example, Boycom implemented Customer Proprietary Network Information ("CPNI") policies and procedures that are consistent with the FCC's regulations. Employees are required to complete CPNI training and employees who have access to CPNI data receive additional guidance through written procedures regarding customer authentication.

**8. Description of rates, terms and conditions of proposed voice telephony service to be supported as Lifeline or Disabled services.**

As required by 47 C.F.R. § 54.101, Boycom will offer voice telephony and broadband services supported by federal universal service support mechanisms, including the following capabilities:

Voice Grade Access To The Public Switched Telephone Network – Boycom meets this requirement through its provision of an interconnected VoIP service packages that include minutes of use for local service provided at no additional charge beyond the package price and

applicable taxes and surcharges to end users (*i.e.*, plans are generally unlimited usage within the U.S.) and access to emergency services via 911 or E-911, wherever available from local government or public safety organizations. Boycom will also provide toll limitation services to qualifying low-income consumers as provided in the Commission's Rules.<sup>10</sup>

Broadband Internet Access Services – Boycom's broadband Internet access service provides the capability to transmit data to and receive data by wire from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service.<sup>11</sup>

Boycom commits to provide these services consistent with applicable high-cost universal service support rules.<sup>12</sup> Boycom will also offer Lifeline service as required by the FCC's rules at all locations where it has been awarded support.<sup>13</sup> Boycom will offer voice telephony as a standalone service and at rates reasonably comparable to urban rates.<sup>14</sup> Boycom will not distinguish rates between the supported area and its current service area and certifies that it will comply with the "reasonably comparable rates."

**9. Explanation of how Boycom intends to provide service through the proposed service area, including areas where the applicant lacks facilities or network facilities.**

Boycom currently offers broadband Internet access service and interconnected VoIP service throughout its built-out service area.

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<sup>10</sup> 47 C.F.R. § 54.101(a)(1)

<sup>11</sup> 47 C.F.R. § 54.101(a)(2)

<sup>12</sup> 47 C.F.R. § 54.101(c)

<sup>13</sup> 47 C.F.R. § 54.101(d)

<sup>14</sup> *USF/ICC Transformation Order*, 26 FCC Rcd at 17693, paras. 80-81; *see also* 47 C.F.R. § 54.101(b).

**10. Boycom will ensure service will be provided in timely manner to requesting customers.**

Boycom provides broadband Internet access service and interconnected VoIP service to subscribers in its service area and has a long, established history of providing service to customers in the southeast Missouri communities it serves.

**11. Boycom is financially viable and technically capable of providing voice telephony service.**

Boycom is financially viable and technically capable of providing the interconnected VoIP voice telephony service. Boycom is a registered interconnected VoIP provider within the state of Missouri.

**12. Description of how Boycom will provide access to directory assistance, operator services and interexchange services.**

Directory assistance, operator services and interexchange services are provided via a combination of Boycom's network and commercial wholesale agreements, including through its resale agreement with Momentum Telecom.

**13. Further certifications required under the Commission's rules in 20 CSR 4240-2.060.**

(a) According to 20 CSR 4240-2.060(1)(K), there are no pending actions or final unsatisfied judgments or decisions against Boycom from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of the application. Neither Boycom nor individuals associated with Boycom have a history of any disciplinary action.

(b) Boycom is not delinquent in any reporting or assessment obligations with the Missouri Commission.<sup>15</sup>

#### **14. Participation in Lifeline or Disability program.**

Pursuant to 20 CSR 4240-31.016, Boycom will offer Lifeline voice and broadband service throughout the eligible areas. This service will include minutes of use for local service provided at no additional charge to eligible consumers (plans are generally unlimited usage within the U.S.). Boycom will offer Lifeline voice and broadband service to qualifying low-income consumers pursuant to the Commission's Lifeline rules.

#### **15. Additional certifications of compliance.**

Consistent with 20 CSR 4240-31.016(2)(B)6) of the Commission's rules, Boycom certifies that it will notify the Commission of any change in company information, will comply with all reporting and assessment obligations and will comply with all FCC and Commission rules, including the ETC requirements found in 20 CSR 4240-31.015. Boycom has no delinquent reporting or assessment obligations to the Commission. Consistent with 20 CSR 4240-31.016(2)(B)(7), Boycom has not sought and obtained a waiver of any ETC requirement from the FCC. Boycom commits to solely conducting business under the name granted for ETC status, which will be Boycom Cablevision, Inc. Boycom will not use additional service or brand names.

#### **16. FCC high-cost compliance.**

Boycom commits to provide these services consistent with applicable high-cost universal service support rules.<sup>16</sup> Boycom will also offer Lifeline service as required by the

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<sup>15</sup> 20 CSR 4240-2.060(1)(L)

<sup>16</sup> 47 C.F.R. § 54.101(c)

FCC's rules at all locations where it has been awarded support.<sup>17</sup> Boycom will offer voice telephony as a standalone service and at rates reasonably comparable to urban rates.<sup>18</sup>

**17. Ownership information.**

Individuals who have a 10% or more ownership interest in Boycom are listed on **Exhibit B**.

**18. Boycom is compliant with contribution obligations to the Federal USF.**

Boycom is compliant with filing and contribution obligations to the Federal USF.

**19. Certification that Boycom commits to solely conduct business under the name granted for ETC status.**

Boycom will conduct business only under the name granted for ETC status.

**20. Statement concerning fraud pursuant to 20 CSR 4240-31.016(2)(B)(4).**

Neither Boycom or an individual owning 10% or more of the company has been subject to any state or federal agency inquiry involving fraud, deceit, perjury, stealing or omission or misstatement of fact.

**21. Compliance statements pursuant to 20 CSR 4240-31.016(2)(B)(6).**

- Boycom will comply with the ETC requirements established by the Missouri Public Service Commission.
- The Company does not intend to seek support from the Missouri USF or participate in the Disabled program.
- Boycom commits to maintaining current company contact information on the Missouri Commission's Electronic Filing and Information System.
- Boycom is compliant with contribution obligations to the federal USF.

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<sup>17</sup> 47 C.F.R. § 54.101(d)

<sup>18</sup> *USF/ICC Transformation Order*, 26 FCC Rcd at 17693, paras. 80-81; *see also* 47 C.F.R. § 54.101(b).

- Boycom is certificated or registered by the Missouri Commission and is compliant with all reporting and assessment obligations.

**V. DESIGNATION OF BOYCOM AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST**

Granting Boycom's Application will serve the public interest through the deployment of broadband and voice services to high-cost areas in Missouri, support investment in facilities and equipment, and expand the number of competitive providers serving rural areas in Missouri.

**VI. CONCLUSION**

For the reasons stated herein, Boycom respectfully requests that the Commission designate Boycom as an ETC in the area identified in **Exhibit A** on an expedited basis and order such other relief as may be appropriate.

Respectfully submitted,

**Boycom Cablevision, Inc.**



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*Its Counsel*

Dated: June 13, 2025

**Exhibit A**

**Missouri Certificate of Good Standing**

# STATE OF MISSOURI



**Denny Hoskins**  
**Secretary of State**

**CORPORATION DIVISION**  
**CERTIFICATE OF GOOD STANDING**

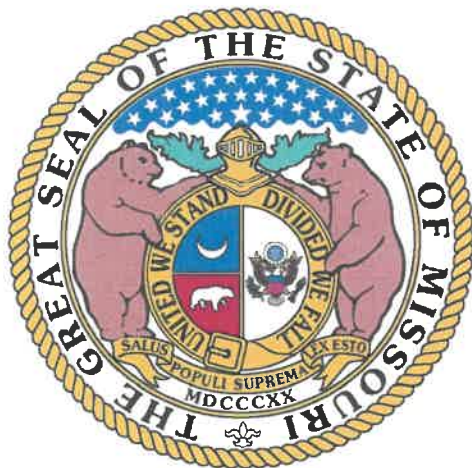
I, DENNY HOSKINS, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

***BOYCOM CABLEVISION, INC.***  
***00374952***

was created under the laws of this State on the 30th day of December, 1992, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 5th day of June, 2025.

*Denny Hoskins*  
Secretary of State



Certification Number: CERT-06052025-0063

## **Exhibit B**

### **Substantial Ownership (10% or more) of Boycom**

Patricia Jo Boyers - CEO/ President

Steven Delaine Boyers - VP/Corp. Secretary

Matthew Boyers - Board Director

## **Exhibit C**

### **Key Personnel Exerting control over Boycom's day-to-day operations**

Patricia Jo Boyers - CEO/ President

Steven Delaine Boyers - VP/Corp. Secretary

Matthew Boyers - Board Director

Timothy Reid Morgan, Chief Operating Officer

Steve Bell – Sr. VP of Operations & Engineering - Board Trustee

Brian Simpson - VP of Operations & Engineering

James Eric Russell - Technical Operations Manager

Ganell Kopp - Customer Relations & Finance Manager

Mary Angela Thurston - Board Chairman

**Exhibit D**

**Affidavit**

## AFFIDAVIT

I, Timothy Reid Morgan, a natural person, do hereby swear or affirm that I am Chief Operating Officer, an Officer of Boycom Cablevision, Inc., and that the information and statements contained in this application are true and correct to the best of my knowledge and belief. By signing this form, I hereby certify that neither I, nor any other members of this filing party, has had communications with a Commissioner, Commissioner Advisor, Regulatory Law Judge, member of the General Counsel or any member of their support team in the sixty (60) days prior to the filing date of this application regarding any substantive issue included in this filing. If any communication of this sort has occurred in the previous sixty (60) day period, I further certify this application was held until sixty (60) days have passed from the date of the subject communication, or we have requested a waiver for good cause as allowed by Commission Rule 20 CSR 4240-4.017(1)(D).

Signature:



Printed Name: Timothy Reid Morgan

Title: Chief Operating Officer

State of Missouri

County of Butler

Subscribed and sworn before me this 12 day of June 2025.

Notary Public

