

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

In the Matter of MOLTD Broadband,)	
LLC d/b/a LTD Broadband, LLC)	<u>File No. DD-2026-0008</u>
To Cancel ETC Service)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Staff Recommendation* states:

1. On July 3, 2025, MOLTD Broadband, LLC d/b/a LTD Broadband LLC (LTD Broadband) filed a request for the Missouri Public Service Commission (Commission) to relinquish its Eligible Telecommunications Carrier (ETC) designation in the State of Missouri effective July 2, 2025.¹

2. On July 7, 2025, the Commission issued an order directing its data center to provide notice to each ETC in the State of Missouri, set an intervention deadline of July 21, 2025, ordered Staff to file a recommendation regarding LTD Broadband's filing no later than July 29, 2025, and provided that any other party wishing to respond to LTD Broadband's filing shall do so no later than July 29, 2025.²

3. Commission Rule 20 CSR 4240-31.015.4 states that the relinquishment of ETC status is accomplished by providing a letter signed by an authorized company official or representative to the Commission at least 60 days prior to the relinquishment of the ETC status. The rule also requires compliance with 47 U.S.C. Section 214(e)(4), which states, in part:

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

¹ On June 12, 2021, the Commission granted the company ETC designation in Missouri in Case No. DA-2021-0205.

² *Order Giving Notice and Directing Staff to File a Recommendation* filed on July 7, 2025.

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, the State commission ... shall require the remaining 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.

4. As more fully explained in Staff's Memorandum, attached hereto as Attachment A and incorporated herein, LTD Broadband has not participated in the USF program and has no subscribers. LTD Broadband obtained its ETC designation in Missouri solely for the purpose of participating in and receiving Rural Digital Opportunity Fund (RDOF) funding from the Federal Communication Commission (FCC), but the FCC denied LTD Broadband's application.

5. Staff recommends the Commission waive the 60 day notice requirement and approve the relinquishment of LTD Broadband's ETC designation in Missouri.

6. The Commission need not hold a hearing, if, after proper notice and opportunity to intervene, no party requests a hearing. *State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission*, 776 S.W.2d 494, 495-96 (Mo. App. W.D. 1989).

WHEREFORE, Staff respectfully recommends the Commission waive the 60 day notice requirement and approve the relinquishment of LTD Broadband's ETC designation in Missouri and grant such other and further relief as the Commission finds appropriate under the circumstances.

Respectfully submitted,

/s/ Mark Johnson

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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 29th day of July, 2025, to all counsel of record.

/s/ Mark Johnson

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. DD-2026-0008

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

Subject: Staff's Recommendation for MOLTD Broadband, LLC d/b/a LTD
Broadband LLC's Notice of Cancellation of Its Eligible
Telecommunication Carrier Designation.

Date: July 29, 2025

On July 3, 2025, MOLTD Broadband, LLC d/b/a LTD Broadband LLC (LTD) filed a request for the Missouri Public Service Commission (Commission) to relinquish its Eligible Telecommunications Carrier (ETC) designation in the State of Missouri, effective July 2, 2025.¹

LTD obtained its ETC designation in Missouri solely for the purpose of participating in and receiving Rural Digital Opportunity Fund (RDOF) funding to expand broadband service to 52,812 locations in Missouri. However, the company's long-form application failed to show it was "legally, technically, and financially qualified" to provide the service and was denied by the FCC. Consequently, the company never received RDOF support and has not provided supported services under its Missouri ETC designation.

LTD hasn't participated in the USF program and has no subscribers. Staff recommends the Commission waive the sixty-day notice requirement and simply approve the relinquishment of MOLTD Broadband, LLC d/b/a LTD Broadband LLC's ETC designation in Missouri at its earliest convenience.

¹ On June 12, 2021, in Case No. DA-2021-0205 the company was granted ETC designation in Missouri.