

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

In the Matter of the Application of LTD)
Broadband LLC for Designation as an Eligible)
Telecommunications Carrier for Purposes of) **File No. DA-2021-0205**
Receiving Federal Universal Service Support)

NOTICE OF DEFICIENCY

Issue Date: January 11, 2021

On January 7, 2021, LTD Broadband LLC (LTD Broadband) filed its application for designation as a wireless Eligible Telecommunications Carrier. Attorney Kristopher E. Twomey, whose office is identified as in Washington, D.C., signed the application as attorney for LTD Broadband. It does not appear, however, from the face of the application, whether Mr. Twomey is licensed to practice law in the state of Missouri,¹ and the application contains no motion for leave to practice before the Commission pro hac vice.

The application states that LTD Broadband is a corporation. Commission Rule 20 CSR 4240-2.040(5), addressing practice before the Commission, states:

A natural person may represent himself or herself. Such practice is strictly limited to the appearance of a natural person on his or her own behalf and shall not be made for any other person or entity.

The basis for this Commission rule is found in Sections 484.010 and 484.020, RSMo.² Section 484.010 defines the practice of law as “the appearance as an advocate in a representative capacity or the drawing of papers, pleadings or documents or the performance of any act in such capacity in connection with proceedings pending or prospective before any court of record, commissioner, referee, or any body, board,

¹ A review of the Missouri Bar's on line publication of attorneys currently licensed to practice in Missouri, <https://mobar.org/> does not contain Mr. Twomey's name.

² All statutory citations refer to RSMo 2016 unless otherwise noted.

committee, or commission constituted by law or having authority to settle controversies.”
Section 484.020 restricts the practice of law and engagement in law business to licensed attorneys.³

As it does not appear from the face of the application whether Mr. Twomey is licensed to practice law in Missouri, the application is defective in that the applicant is a corporation whose application must be signed and presented by an attorney licensed in Missouri or otherwise authorized per a duly granted motion pro hac vice. Because the application is deficient, the Commission will take no further action in this matter until such time as the deficiency is corrected. Per Rule 20 CSR 4240-2.116, the Commission may dismiss this cause for lack of prosecution if no action has occurred within 90 days.



BY THE COMMISSION

A handwritten signature in blue ink that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Ronald D. Pridgin, Regulatory Law Judge,
by delegation of authority pursuant
to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 11th day of January, 2021.

STATE OF MISSOURI
MISSOURI PUBLIC SERVICES COMMISSION

LTD Broadband LLC	)	
Application for Designation as an Eligible	)	
Telecommunications Carrier for Purposes of	)	Docket No. _____
Receiving Federal Universal Service Support	)	

**APPLICATION OF LTD BROADBAND, LLC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

Now comes LTD Broadband LLC (“LTD Broadband”) and pursuant to the Telecommunications Act of 1996, 47 U.S.C. §214(e)(2) (the “Act”) and the rules of the Federal Communications Commission (“FCC”) 47 C.F.R. §54.201, hereby requests that the Missouri Public Service Commission (“Commission”) designate LTD Broadband as an eligible telecommunications carrier (“ETC”) under the provisions of Section 54.201(d) to receive federal universal service support via Lifeline and through the Rural Digital Opportunity Fund (“RDOF”) for the provision of broadband internet access and broadband-voice bundled offerings. The RDOF service area contains 471 census block groups for 52,812 locations in Missouri.¹ The RDOF rules² require provisional winners to obtain ETC status by June 7, 2020 and LTD Broadband therefore respectfully requests expeditious action on this application to meet the obligation.

LTD Broadband is a Minnesota limited liability corporation with a principal place of business and mailing address of PO Box 3064, Blooming Prairie, MN 55917. LTD Broadband will simultaneously be filing an application to become a telecommunications carrier with the

¹ See Exhibit A.

² See 47 CFR § 54.804(b)(5).

Commission. For the reasons stated below, designating LTD Broadband as an ETC is consistent with statutory and regulatory requirements and the public interest.

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

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I. Introduction / Description of Company

Company Background

LTD Broadband is a fixed wireless and fiber optic broadband internet service and voice-over-internet provider with headquarters in Blooming Prairie, Minnesota. LTD Broadband has preliminarily been awarded RDOF funding for the census block numbers and customer locations listed on Exhibit A. LTD Broadband will simultaneously be filing for authority to provide telecommunications services in Missouri.

Broadband Information

Since 2011, the Company has provided high speed internet connectivity with industry standard security and adjustable speeds to both residences and business in its existing 50,000 square mile fixed wireless coverage area with 2100 tower sites located in Iowa, Minnesota, Nebraska, South Dakota, and Wisconsin. The company also has begun deploying fiber optic networks in select areas and intends to continue to build these low-latency, state-of-the-art networks through RDOF funding. Upon completion of the stages of the fiber optic network expansion, residential, business, and municipal customers shall be eligible to receive one gigabit per second access to the internet for both uploads and downloads.

Voice Services Information

LTD Broadband will offer voice services capable of supporting thousands of users. Its platform features include, but are not limited to:

- CALEA Compliant
- Call Detail Records (CDR's)
- DID Included Per Seat
- e911 Included Per Seat
- Fault-Tolerant
- Active-Active Architecture
- Geo-Redundant
- Mobile Phone App Integration
- QOS and MOS Monitoring Per Call
- Call Control
- OAuth Permissions
- Multi-Tenant With Unlimited Domains
- Advanced Security & Fraud Detection
- Auto Block Failed Registrations
- Auto Block SIP Port Scanning
- Auto Block Promiscuous SIP Devices
- Fraud Filtering for Bad Digits or Invalid Destinations
- SIP Call Traces
- Zero-Touch Device Provisioning

LTD Broadband will manage provisioning the service for the customer, all billing aspects, and troubleshooting any calling issues that may arise. Residential customers will be served with Analog Telephone Adapters (ATAs) and IP phones using SIP and UDP/RDP protocols. Calling features available include all of the traditional calling features; call forwarding, caller ID, voice mail, find-me-follow-me, etc. along with more advanced services; Hosted IP Centrex, inbound/outbound call management, etc.

Voice and Broadband Plans

LTD Broadband's residential digital voice service plan is \$25.00 with LTD Broadband internet and \$30 without. Lifeline customers will receive the \$9.25 benefit, lowering the price to \$15.75 per month or \$20.75 respectively. The customer can use its own VoIP-enabled phone, pay an additional fee to use the service's mobile app, or purchase a phone from LTD Broadband. Lifeline customers will receive all of the same features as a non-Lifeline customer. Features include call waiting, caller ID, call forwarding, call transfer, voicemail, and free long distance in the U.S. and Canada.

Lifeline Implementation

LTD Broadband will implement Lifeline based on the current rules and regulations established by the Federal Communications Commission ("FCC") and administered by the Universal Service Administrative Company ("USAC") as those rules may change in the future. LTD Broadband will follow the most recent Report and Orders and Lifeline Reform Order to begin services. The customer will have an option of a residential VoIP only package,

broadband internet package, or a bundled voice and Internet package. LTD Broadband will price its Lifeline service at \$9.25 less than its equivalent non-Lifeline service. Therefore, LTD Broadband's Lifeline service will represent a dollar-for-dollar reduction from its comparable non-Lifeline rate and will represent a pass-through of the full amount of support to the qualifying low-income consumer. LTD Broadband will allow customers to apply the Lifeline subsidy, on a full pass-through basis to packages of voice and broadband services.

LTD Broadband will build a dedicated Lifeline landing page with detailed information, how to apply, and how to contact USAC. Links to the application and worksheet, both English and Spanish, for each state will be available for download. LTD Broadband customer service agents will be trained to help customers fill out and return the form.

Along with the application, LTD Broadband will have a cover sheet with information on how to contact LTD Broadband for help, how to send the application to LTD Broadband (both electronically and by mail), and what additional information LTD Broadband need from the customer. Additional information will include a copy of their current driver's license, copy of their paycheck stubs/SNAP card/Medicaid card/SSI statement/Tribal program, etc., what service(s) they are interested in, and how they heard about LTD Broadband.

Upon receipt of the filled-out application, LTD Broadband's Customer Service Department will process the application through the National Lifeline Accountability Database and let the customer know if they qualify for Lifeline. Additionally, the customer service representative will determine if the customer is in the network service area. Based on their qualification status, services they are interested in, and if service from LTD Broadband is available in their area, the appropriate packages will be offered to the customer for sign up

and installation will be scheduled.

LTD Broadband will submit monthly reimbursement reports to USAC, and will work with USAC on re-certifying any current customers. All documentation related to the customer and Lifeline will be maintained while the customer is with LTD Broadband and for three years after they change providers.

II. Federal Telecommunications Act of 1996, Eligible Telecommunications Carrier

Pursuant to Section 214(e)(2) of the Act, a state commission may, upon its own motion, or upon request, designate a common carrier to be an “eligible telecommunications carrier” for purposes of receiving universal service support under the Act. Section 214(e)(2) also requires that the carrier designated meet the requirements of Section 214(e)(1). Section 214(e)(1) states:

A common carrier designated as an eligible telecommunications carrier... shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received -

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using a media of general distribution.

Section 54.201(b) of the FCC’s Rules states that the Commission shall, on its own motion or upon request, designate a common carrier an ETC so long as the carrier meets the requirements of Section 54.201(d), which restates the requirements found in Section 214(e)(1) of the Act. Section 214(e)(2) of the Act and Section 54.201(c) of the FCC’s Rules

state that the Commission may, in the case of an area serviced by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC for a service area the Commission designates, provided each additional requesting carrier satisfies Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's Rules. Before designating an additional ETC for an area serviced by a rural telephone company, the Commission shall find that such designation is in the public interest.

III. Designated Service Area

Section 214(e)(2) of the Act states that an ETC shall be designated for a "service area" by the state commission. LTD Broadband requests authority as an eligible telecommunications carrier in the census block groups where it will receive RDOF support only.

IV. Requirements for ETC Designation

A. LTD Broadband will offer the services that are supported by federal universal service support mechanisms throughout the service area for which ETC designation is received.

LTD Broadband is a common carrier for purposes of obtaining ETC designation under 47 U.S.C. § 214(e)(1). LTD Broadband commits to provide (i) voice grade access to the public switched telephone network ("PSTN") or its functional equivalent; (ii) minutes of use for local service provided at no additional charge to end users; (iii) access to emergency services; and (iv) toll limitation services to qualifying low-income consumers as provided in accordance with 47 C.F.R. §§54.400 *et seq.*

i. Voice grade access to the public switched telephone network

In its *USF/ICC Transformation Order*, the FCC modified the definition of a supported service to a technologically-neutral approach, allowing companies to provision voice service over any platform, including the PSTN and IP networks.³ Thus, the FCC amended Section 54.101 to specify that the functionalities of eligible voice telephony services include voice grade access to the public switched network or its functional equivalent.⁴ The FCC further explained that increasingly “consumers are obtaining voice services not through traditional means but instead through interconnected VoIP providers offering service over broadband networks.”⁵ Interconnected VoIP services “allow customers to make real-time voice calls to, and receive calls from, the PSTN, and increasingly appear to be viewed by consumers as substitutes for traditional voice telephone services.”⁶ Thus, the FCC concluded that its authority to promote universal services in this context “does not depend on whether interconnected VoIP services are telecommunications services or information services under the Communications Act.”⁷ LTD Broadband will therefore provide voice-grade access to the PSTN by providing interconnected VoIP service throughout the designated service area.

³ *In the Matter of Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund*, 26 FCC Rcd 17663, 17692-93 (2011) (“*USF/ICC Transformation Order*”).

⁴ *Id.*; See also 47 C.F.R. §54.101(a).

⁵ *USF/ICC Transformation Order* at ¶163.

⁶ *Id.*

⁷ *Id.*

ii. Minutes of Use

“Local usage” means an amount of minutes of use of exchange services, prescribed by the FCC, provided free of charge to end users.”⁸ The FCC has not specified a minimum amount of local usage that an ETC must offer. LTD Broadband will meet the local usage requirement by including local usage in its rate plans. The Company will comply with any minimum local usage requirements adopted by the FCC or this Commission.

iii. Access to emergency services

ETCs are required to provide access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911 (“E911”), to the extent the local government in an ETC's service area has implemented 911 or enhanced 911 systems. LTD Broadband will provide access to emergency services by providing 911 and E911 for all of its customers to the extent that the local governments in its designated service areas have implemented 911 and E911.

iv. Toll limitation for Qualifying Low-Income Consumers

LTD Broadband does not distinguish between toll and non-toll for its voice offering. To the extent LTD Broadband offers a service that distinguishes between toll and non-toll calls, it will offer toll limitation to qualifying low-income consumers at no additional charge.

B. Broadband Internet Access Service

Pursuant to 47 C.F.R. 54.101(a)(2), LTD Broadband will provide broadband services with the capability to transmit data to and receive data by wire or radio from all or

⁸ 47 C.F.R. § 54.101(a)(2).

substantially all internet endpoints including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up service. Customers will be provided last mile access by a fiber optic connection.

C. LTD Broadband will comply with the requirements of 47 USC 214(e)(1).

LTD Broadband commits to, throughout its service area: (A) offer supported services “either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier)” and (B) advertise the availability of such services and the charges therefor using media of general distribution

i. LTD Broadband will use its own facilities to provide the supported services

LTD Broadband provides high-speed broadband and digital telephone services to residential, commercial, and enterprise customers utilizing a combination of fiber optic, and unlicensed and licensed wireless frequencies (for backhaul). LTD Broadband will provide supported services using its network infrastructure, consisting of last mile connections and network equipment and components consistent with the RDOF award criteria. It will also utilize its own facilities to provide backhaul for interconnection via a combination of fiber and wireless microwave technologies.

ii. LTD Broadband will advertise the availability of its service throughout its service area.

LTD Broadband 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. LTD Broadband agrees to comply with all

form and content requirements, if any, promulgated by the FCC and this Commission in the future and required of all designated ETCs, including by disclosing the Applicant's name, that the service is a Lifeline service, that it is a government assistance program, that the service is non-transferable, and that it is available only to eligible consumers and limited to one discount per economic household.

D. LTD Broadband will comply with the FCC's additional eligibility criteria contained in 47 CFR §54.202.

- i. LTD Broadband certifies that it will comply with the service requirements applicable to the support that it receives;

LTD Broadband certifies that it will comply with the service requirements applicable to the support that it receives. LTD Broadband commits to provide supported services throughout the designated service area by committing to provide service to customers who make a reasonable request for service. LTD Broadband will commence offering service to all qualified consumers after it is certified as an ETC and soon after it receives ultimate approval from the FCC pursuant to applicable build-out requirements.

- ii. Applicant will provision service that is able to remain functional in emergency situations within industry standards for VoIP services;

LTD Broadband will provision service with sufficient back-up power to remain functional without an external power source in emergency situations. LTD Broadband is able to re-route traffic around damaged facilities and will be able to manage traffic spikes resulting from emergency situations. Applicant uses battery back-up power in the field and battery backup power at its NOC for internet service.

LTD Broadband's VoIP service requires an Internet Protocol (IP) connection to the

Company's network or public Internet and 120VAC power to function. In the event of a failure of the IP connection or the local AC power, the service, including the E911 feature, will not function. Upon activation of a customer, LTD Broadband will provide the customer with a notification containing clear instructions on the use of emergency services.

LTD Broadband's VoIP service is not specifically used as a nomadic device.

Customers can, through mobile applications, move the device to different locations. The end users registered service address is the only location at which the subscriber is authorized to use the service. The service will work if the device is moved to another location within the US and connected to a public internet connection; however, this is only authorized when the subscriber updates their service address prior to using the service at the new location by calling the Company's customer service toll free telephone number.

LTD Broadband service includes enhanced 911 services (E911). When service is initially provisioned, and any time the subscriber's service address is updated, the service location is automatically transmitted to a third party E911 provider who geocodes the address, associates it with a local Public Safety Answering Point (PSAP), provides an electronic positive affirmation that the address was properly geocoded, and stores the record on our behalf. When a subscriber dials 911, the call is routed to the third party 911 provider and then from there to the local PSAP. The location information is transmitted in the call signaling to the local PSAP, and is visible to the operator in E911 enabled PSAPs. In jurisdictions where an E911 service fee is imposed on Interconnected VoIP Services by law, the fee is passed through to the end user and remitted to the local authority in accordance with applicable policy.

iii. LTD Broadband will satisfy consumer protection and service quality standards.

Upon designation as an ETC, LTD Broadband will satisfy all consumer protection and service quality standards as provided in 47 C.F.R § 54.202(a)(3), as well as all applicable state specific consumer protection and service quality standards.

E. Designation of LTD Broadband as an ETC is within the public interest.

Designation of LTD Broadband as an ETC will serve the public interest by facilitating the FCC's goal of developing voice and broadband networks in rural, high-cost areas. Under the 1996 Act, "upon request and consistent with the public interest, convenience and necessity" the Commission shall "designate more than one common carrier as an eligible telecommunications carrier for a service area designated" by the Commission.⁹ Before such a designation, the Commission shall find that the designation is in the public interest.¹⁰ In its *2005 ETC Order*, the FCC determined that the benefits of increased consumer choice, and the unique advantages of the applicant's service offering are components of a public interest analysis.¹¹

Expedited designation of LTD Broadband will serve the public interest by ensuring that the company is eligible to receive federal USF support, including through the FCC's high-cost programs. LTD Broadband will use this funding to directly advance the FCC's goal of deploying voice and broadband-capable networks in rural, high-cost areas

⁹ 47 C.F.R. 54.201(c).

¹⁰ *Id.*

¹¹ *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, CC Docket No. 96-45, FCC 05-46, 20 FCC Rcd 6371, 6389 (rel. Mar. 15, 2005) ("*2005 ETC Order*").

while ensuring that rural consumers and anchor institutions benefit from innovations in communications technology. In particular, LTD Broadband will use federal USF support to expand access to high-speed, high-quality broadband and voice provided through interconnected VoIP and fiber optic broadband for rural residents and businesses. These advanced communications services will provide important connectivity to consumers, businesses, and community anchor institutions, including rural schools, libraries and medical facilities and are a unique alternative to services provided by traditional wireline carriers within the Company's designated service area.

Designation of LTD Broadband as an ETC is also in the public interest because it will promote increased competitive choice, thereby increasing innovation and incenting other carriers to improve their existing networks in order to remain competitive. This will result in greater access to high-speed broadband and voice services, as well as improved service quality for residents of underserved communities in RDOF-eligible areas of the state. LTD Broadband's services will provide consumers with additional choices in communications service providers, as well as a variety of service offerings at competitive rates.

V. Relief Requested

For the reasons set forth above, LTD Broadband respectfully requests: (i) an expeditious Order designating the Company as an ETC for the purpose of being eligible to receive federal funding pursuant to the FCC's Lifeline program; and (ii) such other relief as this Commission deems to be just and equitable.

Respectfully submitted,



Kristopher E. Twomey
Counsel to LTD Broadband

January 6, 2021

Exhibit A

RDOF-Awarded Census Blocks

291534701001	292034702002	292134803022
291534702002	292034701004	290910906002
291534701004	290359601001	290910904002
291534701002	290359602003	290910906003
291534702003	290359601002	290910906001
291534702001	290359601003	290910904003
291534701003	290359602001	290910905003
291534702004	290359602002	290910905002
291534702005	290239506001	291379602001
291534701005	290239506004	291379601004
292154802002	290239501002	291379602002
292154803001	290239501004	291379603003
292154801001	290239509003	291379602004
292154802001	290239502013	291694702861
292154801006	290239502011	291694705001
292154803002	290239506003	291694701022
292154801004	290239509004	291694705003
292154801002	290239506002	291694701021
292154802005	290239501001	291694701011
292154802004	290239501003	291694702871
292154803005	290239509001	291694702872
292154803003	290239509002	291694701012
292154802003	290239505003	291694704003
292154803006	290239507002	291694704004
292154801003	291818702001	291694704001
292154801005	291818702002	291694701023
291494801002	291818701001	291694701014
291494802001	291818701002	291694702873
291494803002	291818704002	291694706002
291494801003	291818701003	291694703891
291494803001	291818703002	291694701013
291494803003	291818703001	291694703901
291494801004	290614702002	291694703892
291494801001	290614701003	292074702001
291494802003	290614701001	292074708001
291494802002	290614701002	292074702002
292034702001	290614702001	292074705001
292034701002	290614702003	292074706001
292034701003	290614702004	292074706003
292034702003	292134804021	292074705002
292034702004	292134804023	292074706002

291319625003	290854701001	290574802004
291319625001	290854701002	290574801003
291319625002	290854705004	291119702001
291319625006	290339602003	291119704001
291319625005	290339602001	291119701001
291319628003	290339602004	291119701002
291319626003	290339602002	291119701003
291319628001	290339603004	291119703001
291319626004	290339603001	291770801003
291319627002	290339603003	291770801004
291319626002	290259501003	291770801002
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291174801001	290259501002	291770802002
291174802002	290259502002	291770802005
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290154607002	292114801003	290299509001
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292236901004	290970121003	290299506002
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290693604001	291258803003	290459501002
290693603003	291258802982	290459501001
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290693601003	291258801002	290718004022
290693601002	290370611002	290718010001
290693606001	290370611004	290718005003
290693605003	290370611001	290718004021
290693605002	290370606004	290718009012
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290693607001	290574801004	291059602984
290693603005	290574802003	291059602986
290693605001	290574802001	291059602985

291679601002	290210028004	290950021001
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291679601004	291138102011	290950135041
290119602004	291138103011	290950147011
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291439605003	290190010022	290950146042
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290510204003	290190011012	290950141055
290510203001	290190012013	290950128031
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290510201982	290190009001	290950151002
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290510109005	290190011031	290950139163
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290019509003	290997001071	291474703003
290079503003	290997003041	291650303082
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290079504002	290270706002	291339502002
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291450210002	291399702001	290318812002
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291892214241	292198201024	
291892214221	292198201021	
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290997006052	291879510003	
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290997006053	291554703003	
290997002061	291554704001	
290997010006	291554703001	

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this day of 11th January, 2021.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

January 11, 2021

File/Case No. DA-2021-0205

**Missouri Public Service
Commission**

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

A handwritten signature in dark ink, reading "Morris L. Woodruff". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.