

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

In the Matter of the Application of)
Clay County Connect, Inc.)
for Designation as an Eligible) Case No. _____
Telecommunications Carrier in the State of)
Missouri)
)

**APPLICATION OF CLAY COUNTY CONNECT, INC. FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF MISSOURI**

COMES NOW Clay County Connect, Inc. (“CCC” or “the Company”) and makes application to the Missouri Public Service Commission (“Commission”) for Designation as an Eligible Telecommunications Carrier (“ETC”) pursuant to Section 214(e)(1)-(2) of the Federal Communications Act of 1934, as amended (“the Act”)¹, Section 54.201 *et seq.* of the rules of the Federal Communications Commission (“FCC”)², and the rules and regulations of the Commission, including 20 CSR 4240-2.060, 20 CSR 4240-31.015 and 20 CSR 4240-31.016. The Company requests ETC designation in the service areas of the Incumbent Local Exchange Carriers listed in **Exhibit B**.

CCC seeks ETC designation solely to provide Lifeline service to qualifying Missouri customers. It will not seek access to funds from the federal Universal Service Fund (“USF”) for the purpose of providing service to high-cost areas in Missouri.³ The Company satisfies all of the statutory and regulatory requirements for designation as an ETC in the requested designated service area. As explained herein, the public interest would be served by granting this petition.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. § 54.201 *et seq.*

³ Given that CCC only seeks Lifeline support from the low-income program and does not seek any high-cost support, CCC seeks a waiver of ETC certification requirements for the high-cost program.

In support of its Application, CCC states the following:

I. BACKGROUND

CCC. Clay County Connect, Inc. is an Arkansas corporation whose principal offices are located at PO Box 459, 3111 Highway 67, Corning, Arkansas (AR) 72422. The nature of CCC's business is the provision of interconnected Voice over Internet Protocol ("VoIP") services. It has obtained ETC designation in Arkansas and provides IVOIP services in that state.

The following company contact information is provided to the Commission for complaints and/or billing dispute issues:

Clay County Connect
Matt Miiller
3111 Hwy 67
PO Box 459
Corning, Arkansas (AR) 72422

The Company commits to resolve complaints received by the Commission against the Company. The above-identified contact person will work with the Commission staff for complaint resolution.

The Company is wholly owned by Clay County Electric (CCE). No other company sharing common ownership or management with CCC has ever received funds from the federal USF or any state universal service fund.

The Company's key management is: Matt Miiller - General Manager and Jeremy Woods - Manager of Customer Service & Sales. CCC receives Lifeline funding, as well as Rural Digital Opportunity Funding ("RDOF") and has been preliminarily selected for Broadband Equity Access and Deployment ("BEAD") funding in Arkansas. CCE is not receiving any FUSF funding. The Company's website can be found at

<https://www.claycountyelectric.com/broadband/>. CCC is not an association. CCC is legally, financially, and technically qualified to provide the services it provides and is applying to provide in this Application.

Pursuant to 4 CSR 240-2.060(1)(C), a Certificate of Authority to transact business in Missouri, issued by the Missouri Secretary of State, is attached hereto and incorporated herein by reference as **Exhibit A**.

Exhibit B is a list of Missouri Incumbent Local Exchange Carriers in whose service areas CCC proposes to provide ETC service.

Exhibit C is an officer's affidavit concerning CCC's technical, financial and managerial resources and abilities.

Upon designation as an ETC, the Company will provide the supported services throughout the requested designated service area and offer Lifeline service to qualified low-income consumers.

Contact Information. All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

Clay County Connect
Matt Miiller
PO Box 459
Corning, Arkansas (AR) 72422

With copies to:

William D. Steinmeier
WILLIAM D. STEINMEIER, P.C.
2031 Tower Drive
Jefferson City, MO 65109
Phone: 573-659-8672
Email: wds@wdspsc.com

Allison D. Rule
Partner
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The *CommLaw* Group
1430 Spring Hill Road, Suite 310
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E-Mail: adr@commLawgroup.com
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Waivers of Certain PSC Rules. CCC is not seeking high-cost support for its IVoIP service.

CCC requests a waiver of 20 CSR 4240-4.017(1), which requires 60-day prior notice of filing a case. Pursuant to 20 CSR 4240-4.017(1)(D), good cause exists because CCC has had no communications with the Missouri Public Service Commission regarding any substantive issue related to this filing, as documented in the affidavit attached hereto as Exhibit C.

Compliance with Rules. CCC commits to comply with all applicable rules of the Missouri Public Service Commission and of the Federal Communications Commission unless waived by this Commission or the FCC.

Designation of Eligible Telecommunications Carriers. Title 47 U.S.C. § 214(e)(2) of the Act provides that a state commission shall upon request designate a common carrier as an eligible telecommunications carrier (“ETC”) for a service area designated by the state commission. Title 47 U.S.C. § 214(e)(1) provides that an ETC shall be eligible to receive universal service support in accordance with section 254 of the Act and shall, in the service area for which the designation is received, offer the services that are supported by federal universal service support mechanisms under section 254(c), either

using its own facilities or a combination of its own facilities and resale of another carrier's services, and shall advertise the availability of such services and their costs using media of general distribution. The Federal Communications Commission has promulgated a list of the services or functionalities that shall be supported by federal universal service support mechanisms at 47 C.F.R. § 54.101.

Scope of CCC Designation Request. CCC seeks ETC designation for the purpose of receiving available support from the federal universal service fund ("USF") for low-income customers only (*i.e.*, Lifeline). The Company requests ETC designation in the service areas of the Incumbent Local Exchange Carriers listed in **Exhibit B**.

For the reasons set forth below, designating CCC as an ETC throughout the requested service areas would serve the public interest, convenience and necessity.⁴

Services Eligible for Federal ETC Support. CCC will offer Lifeline-supported Interconnected VoIP (IVoIP) services in Missouri, as required by 47 C.F.R. § 54.405, including voice telephony with access to emergency services, toll limitation, and other functionalities listed in 47 C.F.R. § 54.101. These services enable low-income customers to make and receive voice calls over broadband connections, ensuring reliable communication. The monthly credit for CCC's Lifeline-supported IVoIP service is \$9.25, which is reasonably comparable to urban IVoIP rates, typically ranging from \$25 to \$52 per month, as required by 47 C.F.R. § 54.202(a)(6). CCC will offer these services in the service areas of the Incumbent Local Exchange Carriers listed in Exhibit B, as designated by the Missouri Public Service Commission per 47 C.F.R. § 54.201(b). The services will be provided using a

⁴ Pursuant to FCC precedent, no "cream-skimming" analysis is necessary because CCC is seeking ETC designation only with respect to low-income support mechanisms. See *Virgin Mobile USA, L.P.*, Order, 24 FCC Rcd 3381, at ¶ 39 n.101 (2009).

combination of CCC's own VoIP infrastructure and resale of underlying broadband services from other carriers, as permitted by 47 C.F.R. § 54.201(d)(1). CCC will advertise the availability and rates of its Lifeline services through media of general distribution, including online platforms, community outreach, and printed materials, in compliance with 47 C.F.R. § 54.201(d)(2). The IVoIP service is designed to remain functional in emergency situations, as required by 47 C.F.R. § 54.202(a)(2), operating over redundant broadband networks with backup power systems at key network nodes to ensure continuity during power outages or network disruptions. CCC certifies it will comply with applicable consumer protection and service quality standards, including the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service, as applicable, per 47 C.F.R. § 54.202(a)(3). CCC is not a winning bidder of Connect America Funding and has no CAF-related obligations.

Additional Required Information. CCC confirms there are no pending actions or final unsatisfied judgments against the Company from any state or federal agency or court involving customer service or rates within the past three years, as required by 20 CSR 4240-2.060(1)(K). The Company is not delinquent in any reporting or assessment obligations with the Missouri Public Service Commission, per 20 CSR 4240-2.060(1)(L). In the last 10 years, no matters involving fraud, deceit, perjury, stealing, or omission/misstatement of fact have been brought by any state, federal, or law enforcement agency against CCC, any person or entity with 10% or more ownership interest in CCC, or any affiliated company under common management or ownership, as required by 20 CSR 4240-31.016(2)(B)4. CCC has not obtained any waivers of ETC-related requirements from the FCC, per 20 CSR 4240-31.016(2)(B)7. CCC further commits to the following, per 20 CSR 4240-31.016(2)(B)6: (1)

CCC will comply with all ETC requirements established by the Missouri Public Service Commission; (2) CCC does not intend to seek support from the Missouri USF or participate in the Disabled program; (3) CCC commits to maintaining current Company contact information on the Missouri Commission's Electronic Filing and Information System; (4) CCC is compliant with contribution obligations to the federal USF; and (5) the Company is certificated or registered by the Missouri Commission and is compliant with all reporting and assessment obligations.

II. CCC SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ETC IN MISSOURI

CCC satisfies each of the statutory and regulatory prerequisites set forth in the Act, the FCC's rules and 20 CSR 4240:

A. The Company Will Independently Comply with FCC's Obligation as Telecommunication Service Provider

The Company will provide the supported service via its Interconnected Voice over Internet Protocol (IVoIP) offering, delivered over transmission obtained from underlying common carriers and, where applicable, through resale arrangements. Consistent with 47 C.F.R. § 214 (e) and 47 C.F.R. § 54.201 (d) (1), the Company will offer the supported service using its own facilities and/ or combination of its own facilities and resale of another carrier's services. Although IVoIP is not itself classified as Title II "telecommunications service" the Company acknowledges and will comply with core FCC obligations applicable to IVoIP providers, including 911/E911, USF/TRS contribution and local number portability. Through its wholesale arrangement, the Company's end-user offering rides on common-carrier transmission, satisfying the statutory prerequisite for ETC designation under 47 U.S.C. § 214(e). The Company will be providing the required services, in part, as a reseller.

B. CCC Offers the Services and Functionalities Supported by the Federal Low-Income Universal Service Program [47 C.F.R. § 54.201(d)]

Pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(d)(1), the Company shall, throughout the service area for which designation is received, offer the services that are supported by Federal universal service support mechanisms defined in 47 C.F.R. § 54.101(a). These supported services include:

Voice Grade Access to the Public Switched Network [47 C.F.R. § 54.101(a)(1)].

“Voice grade access” permits a telecommunications user to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal that there is an incoming call.

Local Usage [47 C.F.R. § 54.101(a)(2)].

“Local usage” means an amount of minutes of use of exchange service provided free of charge to end users. The FCC has specified that a local usage plan is acceptable if it is “comparable to the one offered by the incumbent LEC in the service areas for which the applicant seeks designation.”⁵ This comparability analysis must proceed on a case-by-case basis and take account of value-added capabilities and services incorporated into a plan.⁶

The Company’s current local usage plans (*i.e.*, Lifeline service offerings), summarized in **Exhibit D**, are comparable in value to those offered by ILECs operating in the requested ETC service area. The Company’s plans offer consumers numerous benefits, including larger “local” calling areas and unlimited long distance in the contiguous forty-eight states. In addition, those plans incorporate value-added features, such as caller ID, call waiting, three-

⁵ See *Federal-State Joint Board on Universal Service*, Report and Order, 20 FCC Rcd 6371, at ¶ 32 (2005) (“2005 ETC Order”).

⁶ *Id.*

way calling, and voicemail.

The Company acknowledges a commitment to provide Lifeline discounts and Missouri USF (MoUSF) discounts pursuant to 20 CSR 4240-31, if applicable, at rates, terms and conditions comparable to the Lifeline offerings and MoUSF offerings of the ILEC providing service in the ETC service area.

Dual Tone Multi-Frequency Signaling or its Functional Equivalent [47

C.F.R. § 54.101(a)(3)]. Dual tone multi-frequency (“DTMF”) signaling is a method of conveying call- setup and call-feature information that facilitates the transportation of call set-up and call detail information. The FCC has recognized that out of band digital signaling can serve as a functional equivalent to DTMF for supported voice service. CCC’s IVoIP offering supports the functional equivalent of DTMF and will reliably convey required signaling for call setup and network features. In addition, as an interconnected VoIP provider, CCC complies with all applicable IVoIP obligations, including 911/E911 requirements (47 C.F.R. Part 9, Subpart D), universal service/TRS contributions (47 C.F.R. § 54.706), and local number portability (47 C.F.R. Part 52, Subpart C). CCC will use out-of-band digital signaling and in-band multi-frequency signaling that are the functional equivalent to DTMF signaling.

Single-Party Service or its Functional Equivalent [47 C.F.R. § 54.101(a)(4)]. The FCC’s supported-services rule requires ETCs to provide voice telephony, including voice-grade access (or its functional equivalent), local usage, access to emergency services, and toll-limitation for qualifying low-income consumers. CCC’s interconnected VoIP offering establishes a dedicated, per-call SIP/RTP session for each end user and reliably conveys call-setup and call-feature signaling, which is the functional equivalent of “single-party service.” The Company will meet this requirement with respect to each of its service offerings.

Access to Emergency Services [47 C.F.R. § 54.101(a)(5); 20 CSR 4240-31.010].

“Access to emergency service” includes access to services, such as 911 and enhanced 911 (“E-911”), provided by local governments or other public safety organizations. The Company will provide this required service.

In addition, the Company shall make available to each end-user subscribing to its supported services within its designated service area emergency telephone number services capable of automatic number identification, automatic location identification and call routing facilities to facilitate public safety response, e.g., Enhanced 911 Service, where the local government agency serving the end-user has implemented enhanced 911 systems; and access to telecommunications relay service by dialing 711.

Access to Operator Services [47 C.F.R. § 54.101(a)(6)]. “Access to operator services” means access to automatic or live assistance provided to a customer to arrange for the billing or completion, or both, of a telephone call. The Company will provide this required service.

Access to Interexchange Service [47 C.F.R. § 54.101(a)(7)]. The FCC’s current supported-services rule requires ETCs to provide voice telephony—voice-grade access (or its functional equivalent), local usage at no additional charge, access to emergency services, and toll-limitation for qualifying low-income consumers—rather than listing “access to interexchange service” as a separate element. CCC’s interconnected VoIP offering permits customers to originate and receive interexchange (long-distance) calls via SIP interconnection and underlying carrier arrangements, providing the functional equivalent of interexchange access.

Directory Assistance [47 C.F.R. § 54.101(a)(8)]. “Access to directory assistance”

means access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings. The Company shall provide this required service.

Toll Limitation [47 C.F.R. § 54.101(a)(9)].

“Toll limitation” includes the offering of either “toll control” or “toll blocking” to qualifying low-income customers, as a means of limiting or blocking the completion of outgoing toll calls. An ETC is not required to provide either service if it is incapable of providing such service. The Company’s calling plans do not distinguish between local, and toll calls at the point of dialing, such that CCC cannot offer toll limitation without blocking all service to a customer. However, if for any reason the Company changes the structure of its service plans to distinguish between local and toll calls, CCC will meet the toll limitation requirement by providing toll blocking.

C. The Company Shall Use Its Own Facilities, Or a Combination of Its Own Facilities and Resale of Another Carrier’s Services

Pursuant to 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(d)(1), the Company shall use its own facilities or a combination of its own facilities and resale of another carrier’s services to offer the services that are supported by Federal universal service support mechanisms. Specifically, the Company purchases and resells wholesale services from Alianza and will utilize its own switches to deliver these services to end user customers.

D. CCC Will Advertise the Availability of and Charges for its Universal Service Qualifying Offerings [47 C.F.R. § 54.201(d)(2); 47 CFR §§ 54.405(b) and 54.411(d)]

Pursuant to 47 U.S.C. § 214(e)(1)(B), 47 C.F.R. § 54.201(d)(2), 47 C.F.R. § 54.405(b), the Company shall advertise the availability of the services that are supported by Federal universal service support mechanisms and the charges for such services using media of general

distribution designed to reach those likely to qualify for the service. The Company may advertise, among other means, via newspaper, mail circular, and radio and target residential customers with its advertising efforts. The Company will advertise in accordance with Commission rules. The Company will make a concerted effort to notify municipal, state, and federal governmental agencies whose clientele may likely benefit the most from having the Company designated as an ETC by the Commission. **Exhibit E** contains sample planned advertising.

E. The Company Will Satisfy its Additional Obligations as an ETC

In addition to those requirements set forth in Section 54.201 of the FCC's rules, CCC will satisfy other ETC requirements adopted by this Commission and the FCC. In particular:

Commitment to Provide Service Upon Reasonable Request [47 C.F.R. § 54.202(a)(1)]. Pursuant to 47 U.S.C. § 214(e)(1) and 47 C.F.R. § 54.201(d), the Company shall offer the services that are supported by Federal universal service support mechanisms throughout the service area for which designation is received, using its own facilities and/ or a combination of its own facilities and the resale of another carrier's service, and will advertise the availability of such service using media of general distribution. See 47 C.F.R. § 54.202(a)(1)(i). The Company certifies that it will provide services on a timely basis to requesting customers within the Company's service area where the Company's network already passes the potential customer's premises. See 47 C.F.R. § 54.202(a)(1)(i)(A). The Company certifies that it will provide service within a reasonable period of time, if the potential customer is within the Company's service area but outside its existing network coverage, if service can be provided at reasonable cost by: (1) provisioning and, if necessary, modifying or replacing the requesting customer's VoIP

customer-premises equipment; (2) activating service over the customer's broadband connection and associated underlying common-carrier transport; (3) adjusting network configurations; (4) adjusting customer or network facilities; (5) reselling services from another carrier's facilities to provide service; or (6) arranging additional transport capacity or comparable facilities through partners or other commercially reasonable means. See 47 C.F.R. § 54.202(a)(1)(i)(B). Because the Company seeks only low-income support, as opposed to high-cost funding to support the construction of network facilities, it is not submitting a network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii).⁷

Ability to Remain Functional in an Emergency [47 C.F.R. § 54.202(a)(2)]. Pursuant to 47 C.F.R. § 54.202(a)(2), a carrier seeking ETC designation must demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

Since the Company is providing service to its customers through the use of facilities obtained from other carriers, this arrangement allows the Company to provide to its customers the same ability to remain functional in emergency situations as currently provided by the carriers to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damage facilities, and the capability of managing traffic spikes resulting from emergency situations.

⁷ The FCC has made clear that this requirement applies only to carriers receiving high-cost support. See *2005 ETC Order* at ¶ 23.

Satisfaction of Applicable Consumer Protection and Service Quality Standards

[47 C.F.R. § 54.202(a)(3)]. Pursuant to 47 C.F.R. § 54.202(a)(3), a carrier seeking ETC designation must demonstrate that it will satisfy applicable consumer protection and service quality standards. Accordingly, the Company commits to comply with applicable FCC consumer protection and service quality requirements for IVoIP, including the Customer Proprietary Network Information (CPNI) rules (47 C.F.R. Part 64, subpart U), Truth in Billing (47 C.F.R. §64.2400), local number portability (47 C.F.R. Part 52, Subpart C), 911/E911 obligations (47 C.F.R. Part 9, Subpart D), network outage reporting (47 C.F.R. Part 4), and the robocall mitigation/STIR-SHAKEN rules for voice service providers (47 C.F.R. §§ 64.6300–64.6305). The Company will maintain current consumer disclosures and related materials and will provide updated copies to the Commission upon request.

Once designated as an ETC, the Company will maintain and, upon request, file with the Commission any updates to its consumer protection and service quality policy within 30 days of any change. CCC's IVoIP service enables customers to originate and receive interexchange (long-distance) calls to and from the public switched telephone network through CCC's platform and underlying interexchange carrier arrangement. This provides the functional equivalent of legacy "access to interexchange service" within the FCC's current voice telephone framework (voice-grade access, local usage, access to emergency service, and toll limitation) for eligible low-income subscribers. As an IVoIP provider, CCC also complies with applicable FCC rules.

Billing Requirements The Company shall develop a bill design that can be easily interpreted by its customers and clearly sets forth charges in compliance with state and federal billing requirements. The Company shall provide customer service contact information

online and on billing statements and acknowledges that this requirement also applies to the use of a third-party billing agent by the Company.

Consumer Privacy Protection Standards The Company will satisfy consumer privacy protection standards as provided in 47 C.F.R. 64 Subpart U and service quality standards as applicable.

Equal Access [47 C.F.R. § 54.202(a)(5)] Pursuant to 47 C.F.R. § 54.202(a)(5), the Company certifies that it may be required to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area. The Company acknowledges it shall provide equal access if all other ETCs in that service area relinquish their designations pursuant to section 214(e) of the Telecommunications Act of 1996.

Lifeline Certification and Verification [47 C.F.R. § 54.410]. **Exhibit G** contains the verification and certification procedure that the Company will implement to comply with 47 C.F.R. § 54.409, 47 C.F.R. § 54.410.

5-Year Plan.[47 C.F.R. § 54.202(a)(1)] Pursuant to 47 C.F.R. § 54.202(a)(1)(ii), a carrier seeking ETC designation must submit a five-year plan that describes proposed improvements or upgrades to the Company's network on a wire center-by-wire center basis. Because the Company seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline services to eligible customers, submission of a five-year plan is not required at this time.

Regulatory Fees. The Company shall pay all applicable federal, state, and local regulatory fees, including but not limited to universal service and E-911 fees, in a timely manner.

711 Relay Access. The Company will provide customers with access to telecommunications relay services by dialing 711.

Notify Commission of Changes to Contact Information. The Company shall comply with applicable law concerning the procedure for notifying the Commission of a change in Company-designated contacts.

Annual Reporting Requirements. The Company shall comply with all annual reporting requirements for designated ETCs listed in 47 C.F.R. § 54.209, as applicable. In addition, the Company will annually report to the Commission all USF funding received and the amount of subsidization provided to Lifeline customers.

Customer Complaints. The Company shall comply with applicable law regarding the manner in which customer complaints shall be recorded and maintained.

Service Deposits. Pursuant to 47 C.F.R. § 54.401(c), the Company acknowledges that as an ETC the Company may not collect a service deposit in order to initiate Lifeline service, if the qualifying low-income consumer voluntarily elects toll limitation service from the Company, where available, and if toll limitation services are unavailable, the Company may charge a service deposit.

Number-Portability Charge. Pursuant to 47 C.F.R. § 54.401(e), the Company acknowledges that consistent with § 52.33(a)(1)(i)(C), the Company may not charge Lifeline customers a monthly number-portability charge.

Missouri Application Requirements [20 CSR 4240-2.060(1)(K) and (L)]. The Company has no pending or final judgments or decisions against it from any state or federal agency or court that involve customer rates or service. In addition, CCC has no annual report or assessment fees that are overdue.

F. CCC Lifeline Plans and Discounts

The Company commits to provide Lifeline discounts consistent with 47 CFR 54.401,

47 C.F.R. § 54.403, and 47 CFR 54.411, and as required by Missouri law.

Lifeline [47 CFR § 54.401]. Pursuant to 47 C.F.R. § 54.403, the Company will provide Lifeline discounts in the following manner, which is consistent with the federal Lifeline plan:

Tier 1: Lesser of \$6.50 or maximum amount of ILEC's subscriber line charge

Tier 2: \$1.75 (federal discount)

Tier 3: \$1.75 (one-half of carrier's contribution)

III. DESIGNATING CCC AS A COMPETITIVE ETC WILL SERVE THE PUBLIC INTEREST

Competition furthers the goals of telecommunications service and provides the consumer with a greater choice of providers and service choices, which will in turn result in market-driven prices and quality. Granting the Company ETC status would advance principles of customer service by providing increased competition and is therefore in the public interest. In addition, as a wireless provider, the Company can often serve a larger local calling area than a traditional wireline provider and afford the customer the convenience of telephone mobility.

The designation of the Company as an ETC will offer Lifeline-eligible customers a greater choice of providers for accessing telecommunications services not available to such customers today and should likely expand the participation of qualifying customers in the Lifeline program.

IV. Conclusion

WHEREFORE, Clay County Connect, Inc. respectfully submits that it has met the requirements for eligibility for designation as an Eligible Telecommunications Carrier (ETC) in the State of Missouri. CCC requests that the Missouri Public Service Commission issue an Order granting this Application and designating CCC as an ETC for

Lifeline services in Missouri.

Respectfully submitted,

/s/ William D. Steinmeier

William D. Steinmeier, MoBar #25689

WILLIAM D. STEINMEIER, P.C.

2031 Tower Drive

Jefferson City, MO 65109

Phone: 573-659-8672

Email: wds@wdspsc.com

/s/ Allison D. Rule

Allison D. Rule

MARASHLIAN & DONAHUE, PLLC.

1430 Spring Hill Road, Suite 310

McLean, VA 22102

Phone: 703-714-1312

Email: adr@commlawgroup.com

COUNSEL FOR CLAY COUNTY CONNECT,
INC.

Dated: September 9, 2025

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the PSC Staff Counsel's office (at staffcounsel@psc.mo.gov) and on the Office of the Public Counsel (at opcservice@opc.mo.gov) on this 9th day of September, 2025.

/s/ William D. Steinmeier

William D. Steinmeier

LIST OF EXHIBITS

Exhibit A	Missouri Secretary of State Certificate of Authority And Fictitious Name Registration
Exhibit B	List of Missouri Incumbent Local Exchange Carriers
Exhibit C	Officer's Affidavit
Exhibit D	Lifeline Service Offerings
Exhibit E	Sample Advertisement
Exhibit F	Customer Verification and Certification Procedure

EXHIBIT B

List of Missouri Incumbent Local Exchange Carriers

Company Name	Phone	Type of Service	Company URL
Windstream Communications	800-347-1991	Home Service	https://www.windstream.com
Brightspeed of Missouri, LLC	833-692-7773	Home Service	https://www.brightspeed.com/aboutus/community/lifeline/

EXHIBIT C
OFFICER AFFIVADIT

EXHIBIT C
OFFICER AFFIVADIT

I, Matt Miiller, a natural person, do hereby swear or affirm that I am an officer or general partner of Clay County Connect, 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 affidavit, 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 one hundred fifty (150) days prior to the filing date of this application regarding any substantive issues included in this filing.

Matt Miiller
Signature

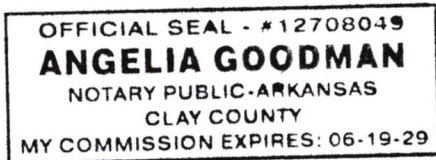
Matt Miiller
Printed Name

General Manager
Title

State of Arkansas

County of Clay

Subscribed and sworn before me this 5th day of September, 2025.



Angelia Goodman
Notary Public

[Seal]

EXHIBIT D
LIFELINE OFFERINGS

With regard to its Lifeline services, Clay County Connect will offer residential VoIP-enabled phone service with unlimited long distance within the contiguous forty-eight states and will include the following features: caller ID, call waiting, call forwarding, three-way calling, and voicemail.

EXHIBIT E
SAMPLE ADVERTISEMENT



RESIDENTIAL PHONE SERVICE

Clay County Connect can save you money on your phone service! Our residential phone service offers unlimited long distance in the continental U.S. along with several features including voicemail, call waiting, call return, three-way calling, call screening, caller ID, and call forwarding. Most existing phone numbers can be ported.

When added to your internet package, the phone service is available for \$24.99 plus tax per month for your first line, and \$9.99 for each additional line.

LifeLine Program Participating Provider

