

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

In the Matter of the Application of New)	
Florence Telephone, LLC d/b/a Rally)	
Networks, New London Telephone)	<u>File No. IM-2026-0079</u>
Company d/b/a Rally Networks, Orchard)	Tracking Nos. JI-2026-0042,
Farm Telephone Company d/b/a Rally)	JI-2026-0043, and JI-2026-0044
Networks, and Stoutland Telephone)	
Company d/b/a Rally Networks for the)	
Merger and Modification of Certificate of)	
Public Convenience and Necessity and)	
Expanding Designation as an Eligible)	
Telecommunications Carrier)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and submits its Recommendation as follows:

1. On September 26, 2025, New Florence Telephone, LLC d/b/a Rally Networks (New Florence), New London Telephone Company d/b/a Rally Networks (New London), Orchard Farm Telephone Company d/b/a Rally Networks (Orchard Farm), and The Stoutland Telephone Company d/b/a Rally Networks (Stoutland), (collectively, “Rally Networks”)¹ filed an application to modify their certificates of public convenience and necessity and for expansion of the area associated with their designation as an Eligible Telecommunications Carrier (ETC).² Subject to FCC approval, Rally Networks is requesting to merge all telecommunications and broadband operations into New Florence.³

¹ All four companies currently do business as Rally Networks. For ease of discussion and to minimize confusion the distinguishing parent company name will be used to identify a specific company.

² ETC status granted in Case No. TO-98-49 and subsequently expanded in Case No IA-2024-0333. The Rally Network companies currently receive federal high-cost support to expand broadband service to approximately 1,579 Missouri locations and has met this obligation.

³ The companies are requesting FCC approval to merge study areas of the four companies which are used in the calculation of federal universal service funding and interstate switched access rates. The request is pending in CC Docket No. 96-45 and a copy is contained in Exhibit 3 of Application.

2. All four companies are ILECs and ETCs participating in the federal high-cost program, the federal and state Lifeline programs and the Missouri Disabled program. New Florence is also an IXC and IVoIP provider and Stoutland is also an IVoIP provider.

3. Missouri's service authorization application requirements to modify service areas are contained in Commission rule 20 CSR 4240-28.011(1)(A) and Missouri ETC application requirements are contained in Missouri Commission rule 20 CSR 4240-31.016. The requirements for relinquishment of ETC status are contained in Missouri Commission rule 20 CSR 4240-31.015(4). This rule indicates a company can relinquish its ETC designation 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. section 214(e)(4). These federal requirements are codified in FCC Rule 47 CFR 54.205 and essentially are intended to ensure the affected area will continue to be served by at least one ETC.

4. Staff conducted an investigation and has provided a memorandum attached to this pleading as Appendix A. As more thoroughly explained therein, Staff reviewed the Rally Network's request for compliance with Missouri's Rules as well as federal requirements. It is Staff's opinion that Rally Networks has adequately met all requirements.

5. Staff recommends the Commission approve Rally Network's request to modify its service authority to provide basic local telecommunications service, expand the ETC designation of New Florence and relinquish New London, Orchard Farm,

and Stoutland's designation as an ETC contingent on and concurrent with the approval by the FCC.

6. Specifically, Staff recommends the following effective January 1, 2026, or as of the effective date of the FCC Order, whichever is later:

- Grant expansion of New Florence's Certificate of Service Authority to provide basic local telecommunications service in the New London, Orchard Farm and Stoutland exchanges;
- Acknowledge New Florence is a "successor in interest" to New London, Orchard Farm and Stoutland;⁴
- Approve the adoption of PSC MO Nos. 5, 7 and 8 tariffs by New Florence;
- Grant the expansion of New Florence's ETC designation to the exchanges of New London, Orchard Farm, and Stoutland for the purpose of receiving federal USF high-cost and Lifeline support and state Lifeline and Disabled support;
- Cancel the Certificates of Service Authority and relinquish the ETC designations of New London, Orchard Farm and Stoutland in Missouri;⁵ and
- Direct Rally Networks to submit a notification filing specifying the effective date of the FCC order once the date is known.

⁴ The application specifically asks the Missouri Commission to acknowledge New Florence will be a "successor in interest" to the three companies. The acknowledgement simply clarifies New Florence will seamlessly continue operations of these three companies as described in paragraph 10 in the application.

⁵ Case No. DD-2026-0098 addresses the cancellation of Stoutland's IVoIP registration.

WHEREFORE, Staff recommends that the Commission approve Rally Network's request to modify its service authority to provide basic local telecommunications service, expand the ETC designation of New Florence and relinquish New London, Orchard Farm, and Stoutland's designation as an ETC contingent on and concurrent with the approval by the FCC; and that it grant such other and further relief as the Commission finds appropriate in the circumstances.

Respectfully submitted,

/s/ Mark Johnson

MARK JOHNSON

Missouri Bar No. 64940

Chief Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-7431 (Voice)

573-751-9285 (Fax)

mark.johnson@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

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 31st day of October, 2025, to all counsel of record.

/s/ Mark Johnson

MEMORANDUM

To: Missouri Public Service Commission Official Case File
Case No. IM-2026-0079

From: Kari Salsman, Senior Research/ Data Analyst
John Van Eschen, Regulatory Compliance Ma
Telecommunications Department

Subject: Staff's Recommendation to Approve Consolidating
Four Rally Network Companies

Date: October 31, 2025

On September 26, 2025, New Florence Telephone, LLC d/b/a Rally Networks (New Florence), New London Telephone Company d/b/a Rally Networks (New London), Orchard Farm Telephone Company d/b/a Rally Networks (Orchard Farms), and The Stoutland Telephone Company d/b/a Rally Networks (Stoutland), (collectively, "Rally Networks")¹ filed an application to modify their certificate of public convenience and necessity and for expansion of the area associated with their designation as an Eligible Telecommunications Carrier (ETC).² Subject to FCC approval, Rally Networks is requesting to merge all telecommunications and broadband operations into New Florence.³ All four companies are ILECs and ETCs participating in the federal high-cost program, the federal and state Lifeline programs and the Missouri Disabled program. New Florence is also an IXC and IVoIP provider and Stoutland is also an IVoIP provider.

According to its application, effective January 1, 2026, or as of the effective date of the FCC Order, whichever is later, New Florence will be the entity solely responsible for providing telecommunications and broadband services to the Rally Networks customers and the other companies will no longer provide telecommunications services to the public.

Missouri's service authorization application requirements to modify its service area are contained in Commission rule 20 CSR 4240-28.011(1)(A) and Missouri ETC application requirements are contained in Missouri Commission rule 20 CSR 4240-31.016. The requirements for relinquishment of ETC status are contained in Commission rule 20 CSR 4240-31.015(4). This rule indicates a company can relinquish its ETC designation by providing a letter signed by an authorized company official or

¹ All four companies currently do business as Rally Networks. For ease of discussion and to minimize confusion the distinguishing parent company name will be used to identify a specific company.

² ETC status granted in Case No. TO-98-49 and subsequently expanded in Case No IA-2024-0333. The Rally Network companies currently receive federal high-cost support to expand broadband service to approximately 1,579 Missouri locations and has met this obligation.

³ The companies are requesting FCC approval to merge study areas of the four companies which are used in the calculation of federal universal service funding and interstate switched access rates. The request is pending in CC Docket No. 96-45 and a copy is contained in Exhibit 3 of Application.

representative at least sixty (60) days prior to relinquishing ETC status demonstrating compliance with 47 U.S.C. section 214(e)(4). These federal requirements are codified in FCC Rule 47 CFR 54.205 and essentially are intended to ensure the affected area will continue to be served by at least one ETC. According to the application all of the other Companies' customers, including those receiving Lifeline and Missouri Disabled support, will continue to be served, without interruption, by New Florence. Staff reviewed Rally Networks' request for compliance with Missouri's Rules as well as federal requirements. In Staff's opinion Rally Networks has adequately met all requirements.

Staff recommends the Commission approve Rally Network's request to modify its service authority to provide basic local telecommunications service, expand the ETC designation of New Florence and relinquish New London, Orchard Farm, and Stoutland's designation as an ETC contingent on and concurrent with the approval by the FCC.

Specifically, Staff recommends the following effective January 1, 2026, or as of the effective date of the FCC Order, whichever is later:

- Grant expansion of New Florence's Certificate of Service Authority to provide basic local telecommunications service in the New London, Orchard Farm and Stoutland exchanges.
- Acknowledge New Florence is a "successor in interest" to New London, Orchard Farm and Stoutland.⁴
- Approve the adoption of PSC MO Nos. 5, 7 and 8 tariffs by New Florence.
- Grant the expansion of New Florence's ETC designation to the exchanges of New London, Orchard Farm, and Stoutland for the purpose of receiving federal USF high-cost and Lifeline support and state Lifeline and Disabled support.
- Cancel the Certificates of Service Authority and relinquish the ETC designations of New London, Orchard Farm and Stoutland in Missouri.⁵
- Direct Rally Networks to submit a notification filing specifying the effective date of the FCC order once the date is known.

⁴ The application specifically asks the Missouri Commission to acknowledge New Florence will be a "successor in interest" to the three companies. The acknowledgement simply clarifies New Florence will seamlessly continue operations of these three companies as described in paragraph 10 in the application.

⁵ Case No. DD-2026-0098 addresses the cancellation of Stoutland's IVoIP registration.