BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Proposed)		
Modifications to the Missouri)	Case No.	TO-2019-0346
Universal Service Fund)		

STAFF'S MOTION FOR CLARIFICATION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Motion for Clarification* in this matter hereby states:

- The Commission issued its *Order* in this matter November 21, 2019.
 In the *Order* are several directives for which Staff now requests clarification.
- 2. First, Staff recommended a flexible window of time in which the affected providers may implement any change in the Lifeline and Disabled support amount, to be completed no later than February 1, 2020. The *Order* appears to contemplate all changes to support occurring at February 1, 2020. Further the order states it is effective December 3, 2019, as requested by Staff. Staff is not aware of making such a request; therefore, Staff now asks the Commission to clarify whether an affected provider may implement the support change as soon as practical between December 1, 2020 and February 1, 2020.
- 3. Additionally, Staff recommended that both the Lifeline and the Disabled support amounts be permitted to total \$24.00 when combined with the applicable federal support amount. The *Order* appears to indicate the Missouri USF Lifeline support amount is \$16.75 and that state and federal Lifeline support combined is limited to \$24. Staff now asks the Commission to clarify whether

Missouri USF Lifeline support is \$16.75 for all Lifeline subscribers or a total of \$24 from federal and state programs. As demonstrated in its November 18, 2019 filing, *Staff's Notice Regarding Recommendation*, there are different combinations of federal and state lifeline support amounts that when combined will ensure a total support amount of \$24 for each Lifeline subscriber. That table is reproduced here for the Commission's reference.

VOICE + QUALIFYING* BROADBAND

		Effect of Staff's
	Current	Recommendation
Federal Lifeline Support	\$9.25	\$9.25
State Lifeline Support	\$6.50	\$14.75
TOTAL	\$15.75	\$24.00

^{*}Broadband speed equal to/or greater than 20/3

VOICE-ONLY OR VOICE + NON-QUALIFYING* BROADBAND

	Effect of Staff's	
	Current	Recommendation
Federal Lifeline Support	\$9.25	\$7.25
State Lifeline Support	\$6.50	\$16.75
TOTAL	\$15.75	\$24.00

^{*}Broadband speed less than 20/3

4. It is not clear whether the Commission intended for all Lifeline subscribers to receive the total of \$24 in combined federal/state support, or if the Commission intended for the Missouri USF Lifeline support to be \$16.75 for all Lifeline subscribers, no matter the combined outcome.

5. Staff further requests the Commission clarify that, although the assessment is suspended effective 1/1/2020, providers are required to remit to the fund administrator any assessments collected through 12/31/2019, no matter the providers' remittance cycle.

WHEREFORE, Staff prays that the Commission will accept its *Motion*; clarify its *Order*, and grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

Whitney Payne
Senior Staff Counsel
Missouri Bar No. 64078
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
whitney.payne@psc.mo.gov

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 22nd day of November, 2019, to all counsel of record.