

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

**Response of the Missouri Small Telephone Company Group and
the Missouri Independent Telephone Company Group**

The Missouri Small Telephone Company Group (STCG) and Missouri Independent Telephone Company Group (MITG), offer the following comments in response to Staff’s October 29, 2019 Notice to Commission regarding the Missouri Universal Service Fund (MoUSF).

1. The STCG and MITG continue to support Staff’s proposal to increase MoUSF support for qualifying Lifeline customers.
2. On May 1, 2019, the MoUSF Board voted unanimously in favor of Staff’s proposal to increase the total amount of Lifeline support to \$24.00 per month per customer (*i.e.* federal USF support combined with MoUSF support).
3. On December 1, 2019, federal USF Lifeline support will be reduced by \$2.00 due to the FCC’s scheduled phasedown in voice-only Lifeline support. Thus, Staff correctly notes that Missouri’s Lifeline voice-only customers will pay \$2.00 more for Lifeline service next month unless the Commission takes action.¹ This is consistent with the Commission’s August 1, 2019, Comments to the FCC pointing out that “voice-only subscribers may be forced to pay more for voice service ...[and] Lifeline subscribers will not understand why their bill has increased.”²

¹ Contrary to AT&T’s July 15, 2019 Comments, there has been no indication that the FCC will delay its phasedown of voice-only Lifeline support.

² Missouri PSC Comments to FCC in WC Docket No. 11-42.

4. Increasing the MoUSF support amount will ameliorate this impact and is clearly consistent with the MoUSF’s statutory purpose: “To assist low-income customers and disabled customers in obtaining affordable telecommunications services.” §392.248.2(2) RSMo. Staff’s projections demonstrate that the MoUSF has a sufficient balance to increase support for Lifeline customers. Therefore, the MoUSF should be used for its statutory purpose – to assist low-income customers in obtaining affordable telecommunications services.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on this 7th day of November, 2019, to all counsel of record.

/s/ Trip England