

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

In the Matter of the Application of)	
YourTel America, Inc.)	
To Amend its Designation as an Eligible)	Case No. RA-2011-0376
Telecommunications Carrier in the State of)	
Missouri)	

**APPLICATION OF YOURTEL AMERICA, INC. TO AMEND ITS DESIGNATION AS
AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE STATE OF MISSOURI**

COMES NOW YourTel America, Inc. (“YourTel” or “Company”) and makes application to the Missouri Public Service Commission (Commission) to amend its 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 4 CSR 240-2.060 and 4 CSR 240-3.570. By this Application, the Company requests that its wireless ETC designation be amended and expanded to include the service areas of the Incumbent Local Exchange Carriers listed in **Exhibit A**.

YourTel seeks to amend its wireless ETC designation solely to provide Lifeline and Link-Up service to qualifying Missouri customers in the expanded ETC service area. It will not seek access to funds from the federal Universal Service Fund (USF) for the purpose of providing service to high-cost areas.³ The Company satisfies all of the statutory and regulatory requirements for designation as an ETC in the requested,

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. § 54.201 *et seq.*

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

expanded designated service area. As explained herein, the public interest would be served by granting this Application.

In support of its Application, YourTel states the following:

I. BACKGROUND

YourTel America. YourTel America, Inc. is a Missouri corporation whose principal offices are located at 2800 East 18th Street, Kansas City, Missouri (MO) 64127. The Company's telephone number is 855-299-2990. The nature of YourTel's business is telecommunications, including the provision of wireless services on a common carrier basis.

YourTel America (f/k/a The Pager Company d/b/a The Pager & Phone Company) is certificated by this Commission to provide basic local exchange, local exchange and interexchange service in Missouri. Case No. TA-99-115, *Order* issued April 12, 1999, effective April 22, 1999; Case No. XA-2003-0118, *Order* issued November 5, 2002, effective November 15, 2002.

Applicant was the first Missouri Competitive Local Exchange Carrier (CLEC) to obtain ETC status, as a wireline carrier, in Case No. CO-2003-0094 (*Order* issued April 1, 2003, effective April 11, 2003). The Commission approved the change of name from The Pager Company d/b/a The Pager & Phone Company to YourTel America, Inc. in Case No. CN-2007-0218, *Order* dated January 3, 2007, effective January 17, 2007. YourTel's ETC status was expanded in 2008 to include a number of exchanges in the St. Louis Metropolitan Area. Case No. CO-2008-0334, *Order* issued June 12, 2008, effective June 22, 2008.

In 2009, the Commission further expanded YourTel's ETC designation to include low-income support for wireless telecommunications services provided by YourTel

America. Case No. CO-2009-0257, *Order* issued March 11, 2009, effective March 21, 2009. That ETC designation was as to 35 exchanges listed in Exhibit B of YourTel's Application in the case. By the instant Application, YourTel seeks to expand the area in which it is authorized to provide federal Universal Service Fund low-income support for wireless service through the Lifeline and Link-Up programs.

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

Matt Connolly
YourTel America, Inc.
2800 East 18th Street
Kansas City, Missouri (MO) 64127
Telephone: (816) 388-1066
Toll-Free Number for Customer Inquiries: 1-855-299-2990
Email: mconnolly@yourtel.com

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.

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, was attached to the Applications in Case Nos. CO-2008-0334 and CO-2009-0257, and is hereby incorporated by reference herein, pursuant to 4 CSR 240-2.060(1)(G). YourTel remains in "Good Standing" status with the Missouri Secretary of State.

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

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

Upon grant of this amendment to its designation as an ETC, the Company will provide the supported services throughout the requested designated service area and offer Lifeline and Link-Up service to qualified low-income consumers.

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

William D. Steinmeier
William D. Steinmeier, P.C.
P.O. Box 104595
Jefferson City, Missouri (MO) 65110-4595
Telephone: (573) 659-8672
Facsimile: (573) 636-2305
Email: wds@wdspsc.com

With a copy to:

Dale R. Schmick
Vice President
YourTel America, Inc.
2800 East 18th Street
Kansas City, Missouri (MO) 64127
Telephone: (816) 388-1000
Facsimile: (816) 388-1044
Email: dschmick@yourtel.com

Waivers of Certain PSC Rules. Since YourTel is not seeking high cost support for its wireless service, it requests a waiver of the following rules of the Missouri Public Service Commission in this matter: 4 CSR 240-3.570(2)(A) 1 through 3; and 4 CSR 240-3.570(4). YourTel understands these rule provisions to relate solely to the receipt and expenditure of high-cost funds. As YourTel will not apply for or accept federal high-cost funding, the Company believes that these rules are not applicable to YourTel's ETC Amendment Application and, therefore, should be waived. Pursuant to 4 CSR 240-2.060(4), YourTel submits that these circumstances constitute good cause for waiver of these rules.

Compliance with Rules. YourTel 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.

The FCC's rules, as well as the rules and orders of the Missouri Public Service Commission, impose additional requirements on a common carrier seeking designation as an ETC. As demonstrated below, and as previously determined by this Commission, YourTel satisfies each of these requirements.

Scope of YourTel Designation Request. YourTel seeks an expanded ETC designation for the purpose of receiving available support from the federal universal service fund (USF) for low-income customers only (*i.e.*, Lifeline and Link-Up

support). The Company requests ETC designation in the service areas of the Incumbent Local Exchange Carriers listed in **Exhibit A**.

For the reasons set forth below, expanding YourTel's designation as an ETC throughout the requested service areas would serve the public interest, convenience and necessity.⁴

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

YourTel continues to satisfy each of the statutory and regulatory prerequisites set forth in the Act, the FCC's rules and 4 CSR 240-3.570:

A. The Company is a Common Carrier

The Company is regulated as a common carrier under 47 C.F.R. § 20.9(a)(10) which provides that mobile satellite service involving the provision of commercial mobile radio service (by licensees or resellers) directly to end users shall be treated as common carriage services. The Company continues to provide the required services, in part, as a reseller.

B. YourTel 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, continue to 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:

⁴ Pursuant to FCC precedent, no "cream-skimming" analysis is necessary because YourTel is seeking to amend its 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).

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); 4 CSR 240-3.570 (2)(A)10)]. “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 plan (i.e., Lifeline service offering), summarized in **Exhibit C**, is comparable in value to those offered by ILECs operating in the requested ETC service area. The Company’s plan offers consumers numerous benefits, including larger “local” calling areas, the availability of mobile service, and local and long-distance calling options. In addition, this plan incorporates value-added features, such as caller ID, call waiting, three-way calling, and voicemail; and domestic text messaging at 0.3 minutes per text.

The Company acknowledges a continued commitment to provide Lifeline and Link-Up discounts and Missouri USF (MoUSF) discounts pursuant to 4 CSR 240-31, if

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

⁶ *Id.*

applicable, at rates, terms and conditions comparable to the Lifeline and Link Up 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); 4 CSR 240-3.570 (3)(C)1.A.]. Dual tone multi-frequency (“DTMF”) signaling is a method of signaling that facilitates the transportation of call set-up and call detail information. The FCC has recognized that, with respect to wireless carriers, it “is appropriate to support out-of-band signaling mechanisms as an alternative to DTMF signaling.”⁷ YourTel will use out-of-band digital signaling and in-band multi-frequency signaling that is the functional equivalent to DTMF signaling throughout its expanded ETC service area.

Single-Party Service or its Functional Equivalent [47 C.F.R. § 54.101(a)(4); 4 CSR 240-3.570 (3)(C)1.B.]. With respect to wireless carriers, “single-party service” affords a user a dedicated message path for the length of a user’s particular transmission. The Company will continue to meet this requirement with respect to each of its service offerings.

Access to Emergency Services [47 C.F.R. § 54.101(a)(5); 4 CSR 240-3.570 (3)(C)1.C.]. “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 continue to provide this required service throughout its expanded ETC service area.

In addition, pursuant to 4 CSR 240-3.570(3)(C)1.D. and F., respectively, the Company shall continue to make available, to each end-user subscribing to its

⁷ *Federal-State Joint Board on Universal Service*, Report and Order, 12 FCC Rcd 8776, at ¶ 71 (1997).

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); 4 CSR 240-3.570 (3)(C)1.H.]. “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 shall provide this required service throughout its expanded ETC service area.

Access to Interexchange Service [47 C.F.R. § 54.101(a)(7); 4 CSR 240-3.570 (3)(C)1.E.]. With respect to wireless carriers, “access to interexchange service” means access to the functional equivalent of the use of the loop, as well as that portion of the switch that is paid for by the end user, necessary to access an interexchange carrier’s network. YourTel has interconnection arrangements with interexchange carriers which enable YourTel to provide its customers access to interexchange services. The Company shall provide this required service throughout its expanded ETC service area.

Directory Assistance [47 C.F.R. § 54.101(a)(8); 4 CSR 240-3.570 (3)(C)1.G.]. “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 continue to provide this required service throughout its expanded ETC service area.

Toll Limitation [47 C.F.R. § 54.101(a)(9); 4 CSR 240-3.570 (3)(C)1.I.].

YourTel can provide toll limitation to wireline and wireless customers by utilizing its toll blocking capabilities, enabling YourTel to provide toll blocking service for Lifeline customers. YourTel will continue to provide these capabilities throughout its expanded ETC service area.

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.

D. YourTel 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); 4 CSR 240-3.570(2)(A) 6 and 7]

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), and 4 CSR 240-3.570(2)(A)6., 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 television, radio, newspaper, magazine, direct mailings, public exhibits and displays, bill inserts and telephone directory advertising. The Company will advertise in accordance with Commission rules. In addition, YourTel will advertise the availability of Lifeline and Link-Up benefits throughout its service area by including mention of such benefits in advertising and continued outreach efforts to members of the community

likely to qualify for Lifeline and Link-Up benefits. **Exhibit D** 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, YourTel 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); 4 CSR 240-3.570(3)(C)3.]. 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. In addition, the Company commits to provide service throughout its expanded designated service area to all customers making a reasonable request for service. See 47 C.F.R. § 54.202(a)(1)(i). The Company certifies that it will provide service 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 continue to provide service within a reasonable period of time, throughout the expanded ETC service area, if the potential customer is within the Company's licensed service area but outside its existing network coverage, if service can be provided at reasonable cost by: 1) modifying or replacing the requesting customer's equipment; 2) deploying a roof-mounted antenna or other equipment; 3) adjusting the nearest cell tower; 4) adjusting network or customer facilities; 5) reselling services from another carrier's facilities to provide service; or 6) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment. 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).⁸

Ability to Remain Functional in an Emergency [47 C.F.R. § 54.202(a)(2); 4 CSR 240-3.570 (2) (A)4.]. Pursuant to 47 C.F.R. § 54.202(a)(2) and 4 CSR 240-3.570(2)(A)4., 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.

Through a combination of its own facilities and those of other carriers, the Company will continue to be able to remain functional in emergency conditions, including access to a reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

Satisfaction of Applicable Consumer Protection and Service Quality Standards [47 C.F.R. § 54.202(a)(3); 4 CSR 240-3.570 (2)(A)8 and 10(B).]. 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. Pursuant to 4 CSR 240-3.570(2)(B), the Company commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless

⁸ The FCC has made clear that this requirement applies only to carriers receiving high-cost support. See 2005 ETC Order at ¶ 23.

Service. **Exhibit E** contains a copy of the consumer code for wireless service most recently recognized by CTIA, to which the Company commits to abide.

The Company, pursuant to 4 CSR 240-3.570(2)(B), shall file with the Commission any changes to the consumer code for wireless service included with its petition or any subsequent code approved under this section of the rule, within 30 days of the change.

Billing Requirements [4 CSR 240-3.570 (3)(A) and (B)]. Pursuant to 4 CSR 240-3.570(3)(A), the Company shall continue to maintain a bill design that can be easily interpreted by its customers and clearly sets forth charges in compliance with state and federal billing requirements.

Pursuant to 4 CSR 240-3.570(3)(B), the Company shall continue to 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 [4 CSR 240-3.570 (2)(A)8] Pursuant to 4 CSR 240-3.570(2)(A)8., 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); 4 CSR 240-3.570 (2)(A)9.] 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.

Pursuant to 4 CSR 240-3.570(2)(A)9., the Company acknowledges it shall provide equal access pursuant to 4 CSR 240-32.100(3) and (4) 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; 4 CSR 240-3.570 (5)(B)]. **Exhibit F** 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, and 4 CSR 240-31.050.

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 and Link Up services to eligible customers, submission of a five-year plan is not required at this time.

Regulatory Fees. The Company shall continue to 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 [4 CSR 240-3.570 (3)(C)1.F.]. The Company will provide customers with access to telecommunications relay services by dialing 711 throughout the expanded service area.

Notify Commission of Changes to Contact Information [4 CSR 240-3.570(3)(F)]. The Company shall comply with 4 CSR 240-3.570(3)(F) concerning the procedure for notifying the Commission of a change in Company-designated contacts.

Informational Filing [4 CSR 240-3.570(3)(D)]. Pursuant to 4 CSR 240-3.570(3)(D), within 30 days of receiving ETC status, the Company shall amend its informational filing with the Commission consisting of a complete description of all of its service offerings. The Company will amend its informational filing as service offerings are introduced or modified.

Annual Reporting Requirements. The Company shall continue to comply with all annual reporting requirements for designated ETCs listed in 47 C.F.R. § 54.209, as applicable.

Customer Complaints. The Company shall continue to comply with the provisions of 4 CSR 240-3.570(3)(E) 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 [4 CSR 240-2.060(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, Company has no annual report or assessment fees that are overdue.

D. YourTel Lifeline and Link-Up Plans and Discounts

The Company commits to provide all Lifeline and Link-Up discounts consistent with 47 CFR 54.401, 47 C.F.R. § 54.403, and 47 CFR 54.411, as required by 4 CSR 240-3.570(2)(A)7.

Lifeline [47 CFR § 54.401; 4 CSR 240-3.570(2)(A)7]. Pursuant to 47 C.F.R. § 54.403 and 4 CSR 240-3.570(2)(A)7., the Company will provide Lifeline discounts in the following manner, consistent with the federal Lifeline plan, throughout its expanded ETC service area:

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)

Link-Up [47 CFR § 54.411; 4 CSR 240-3.570(2)(A)7]. Under 47 C.F.R. § 54.411(a)(1), Link Up is an assistance program for qualifying low-income consumers that an ETC shall offer as part of the provision of services supported by the federal universal service support mechanism and consists of a reduction in the carrier's customary charge for commencing telecommunications service for a single telecommunications connection at a consumer's principal place of residence. The reduction shall be half of the customary charge or \$30.00, whichever is less. YourTel's activation fee is \$60. The Company will be reducing its activation charge by \$30.00. The customer will also receive a one-time promotional discount of \$30.

III. DESIGNATING YOURTEL 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. Expanding the Company's 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 expansion of the Company's ETC service area will offer more Lifeline-eligible customers a greater choice of providers for accessing telecommunications services not available to such customers today and should likely expand participation of qualifying customers in the Lifeline program.

IV. Conclusion

WHEREFORE, YourTel America, Inc. respectfully submits that it continues to meet the requirements for designation as an Eligible Telecommunications Carrier (ETC) in the State of Missouri. YourTel requests that the Missouri Public Service Commission issue an Order amending YourTel's wireless ETC designation by expanding YourTel's ETC service area for wireless Lifeline and Link Up services in Missouri.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR YOURTEL AMERICA, INC.

Dated: May 17, 2011

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at opcservice@ded.mo.gov and on the General Counsel's office at gencounsel@psc.mo.gov this 17th day of May 2011.

/s/ William D. Steinmeier


William D. Steinmeier

LIST OF EXHIBITS

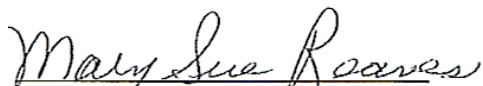
Exhibit A	List of Missouri Incumbent Local Exchange Carriers
Exhibit B	Officer's Affidavit
Exhibit C	Lifeline and Link-Up Service Offerings
Exhibit D	Sample Advertisements
Exhibit E	CTIA Consumer Code for Wireless Service
Exhibit F	Customer Verification and Certification Procedure

VERIFICATION

I, Dale R. Schmick, first being duly sworn, hereby state that I am Vice President of YourTel America, Inc. that I am authorized to make this verification on behalf of YourTel America, Inc., that I have read the foregoing Application for amendment of its designation as an Eligible Telecommunications Carrier, that I have knowledge of the facts stated therein, and that the same are true and correct to the best of my knowledge, information and belief.


Dale R. Schmick
Vice President
YourTel America, Inc.

Subscribed and sworn before me this 17th day of May, 2011.


Notary Public

SEAL Mary Sue Reaves
Notary Public, State of Oklahoma
My Commission Expires
September 29, 2014

