

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

IN THE MATTER OF THE APPLICATION)	
OF YMAX COMMUNICATIONS CORP.)	
FOR DESIGNATION AS AN ELIGIBLE)	CASE NO.
TELECOMMUNICATIONS CARRIER)	

**APPLICATION FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER**

YMax Communications Corp. (“Applicant”), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”)¹ and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission (“FCC”),² and the rules and regulations of the Missouri Public Service Commission (“Commission”), including 4 CSR 240-3.570, hereby applies to the Commission for designation as an Eligible Telecommunications Carrier (“ETC”) throughout the Southwestern Bell Telephone Company, L.P. d/b/a AT&T Missouri service area (the “Designated Service Area”) for the purpose of receiving federal and state universal service support. The Applicant is seeking only low income support, and is not requesting high cost support. As demonstrated below, Applicant satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area, including the new requirements outlined in the FCC’s *Lifeline and Link Up Reform Order*.³ Furthermore, designation of Applicant as an ETC in the Designated Service Area will serve the public interest. Accordingly, Applicant respectfully requests that the Commission grant this Application.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R. §§ 54.101-54.207.

³ *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline and Link Up Reform Order*”).

All correspondence, pleadings, filings and orders should be direct to Applicant's in-state attorney:

Diana Vuylsteke
Bryan Cave LLP
211 North Broadway, Suite 3600
St. Louis, MO 63102
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dmvuylsteke@bryancave.com

I. Background

1. Applicant is a Delaware corporation⁴ and is authorized to conduct business in the State of Missouri. Copies of the Applicant's Articles of Incorporation, Certificate of Authority and Certificate of Good Standing in Missouri are on file with the Commission and are attached hereto as Exhibit 1. The Applicant was granted a Certificate to Provide Basic Local Telecommunications Service in the State of Missouri in Case No. CA-2006-0373 by Order effective June 4, 2006. The principal office of the Applicant is located at 5700 Georgia Ave, West Palm Beach, Florida 33405. The telephone number of the Applicant is (561) 586-3380. The Applicant provides local exchange services in the Designated Service Area using a combination of its own facilities and resale of another carrier's services.

2. No state has denied any ETC petition filed by Applicant, nor have any such petitions been withdrawn.

3. As set forth in Section 214(e)(2) of the Act, the Commission "shall upon its own motion or upon request designate a common carrier that meets the requirements of [Section 214(e)(1)] as an eligible telecommunications carrier for a service area designated by the State

⁴ YMAX was incorporated in the State of Delaware on May 24, 2005.

commission.”⁵ Upon designation as an ETC, the carrier shall be eligible to receive universal support in accordance with Section 254 of the Act.⁶

4. The requirements for designation as an ETC set forth in Section 214(e)(1) are that the carrier must:

- a) offer the services that are supported by Federal universal 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 (including the services offered by another eligible telecommunications carrier); and
- b) advertise the availability of such services and the charges therefore using the media of general distribution.⁷

II. Area for Which ETC Designation Is Requested

5. Applicant requests ETC designation throughout all AT&T Missouri exchanges, as identified in Exhibit 2 attached hereto. Applicant does not seek designation as an ETC in any areas served by rural telephone companies.

III. YMAX Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area

6. Applicant is a common carrier as that term is defined in the Act.⁸ The Applicant will provide the supported services in the Designated Service Area.

⁵ 47 U.S.C. § 214(e)(2); *see* 47 C.F.R. § 54.201(b) (FCC Rules citing the Act’s requirements).

⁶ 47 U.S.C. § 214(e)(1).

⁷ *Id.*

⁸ *See* 47 U.S.C. § 153(10) (“the term ‘common carrier’ or ‘carrier’ means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy . . .”).

7. Applicant offers all of the supported services enumerated under Section 254(c) using either its own facilities or a combination of its own facilities and resale of another carrier's services. Accordingly, Applicant satisfies the requirement set forth in Section 214(e)(1)(A).

8. The services that are supported by Federal universal support mechanisms under section 254(c) are enumerated at 47 C.F.R. § 54.101(a)(1) and 4 CSR 240-3.570(3)(C). These services are:

- a) Voice grade access to the public switched telephone network (PSTN). "Voice grade access" is defined as a functionality that enables a user of telecommunications services 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 indicating there is an incoming call. Applicant is able to originate and terminate telephone service for all of its subscribers;
- b) Local usage. As part of the voice grade access to the PSTN, an ETC must provide minutes of use for local service at no additional charge to end-users. Applicant's service includes unlimited local usage that allows customers to originate and terminate calls within the local calling area without incurring toll charges;
- c) Access to emergency services. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems. Applicant will provide its customers with access to these services;

- d) Toll limitation for qualifying low-income consumers. Toll Blocking allows customers to block the completion of outgoing toll calls. Toll Control allows the customer to limit the dollar amount of toll charges a subscriber can incur during a billing period. Applicant provides qualifying Lifeline customers with access to toll limitation.⁹ Applicant will seek toll limitation service (“TLS”) reimbursement from the USF;
- e) While no longer required by 47 C.F.R. § 54.101(a), Applicant provides dual tone multi-frequency (“DTMF”) signaling to expedite the transmission of call set up and call detail information throughout the network, single party service for the duration of each telephone call and not multi-party (or “party-line”) services, access to operator services, the ability to make interexchange, or long distance, telephone calls, and access to directory assistance services.

9. Applicant will advertise the availability of the above-referenced services and the charges for those services in the Designated Service Area using media of general distribution, as required by FCC Rules and pursuant to 4 CSR 240.3.570(2)(A)6.¹⁰ In accordance with 4 CSR 240.3.570(2)(A)7, Applicant will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for those services, using media such as television, radio, and marketing at targeted retail locations. Accordingly, Applicant satisfies the requirement set forth in Section 214(e)(1)(B).

⁹ On December 30, 1997, the FCC issued an order clarifying its definition of “toll limitation” services as either toll blocking or toll control and requires carriers to offer only one, not necessarily both, of these services to be designated as an ETC.

¹⁰ See 47 C.F.R. § 54.201(d)(2).

10. In accordance with 47 C.F.R. § 54.202(a)(1)(i), Applicant commits to comply with the service requirements applicable to the support that it receives. As a common carrier seeking designation as an ETC for low-income support only, Applicant is not required to submit a network improvement plan.¹¹ Therefore, Applicant respectfully requests a waiver of 4 CSR 240-3.570(2)(A)1-3.

11. An ETC Applicant must demonstrate its ability to remain functional in emergency situations 47 CFR §54.202(a)(2); 4 CSR 240-3.570(2)(A)4. Since Applicant is providing service to its customers through the use of its own redundant facilities, Applicant will provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs 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 damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.

12. An ETC Applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards 47 C.F.R. § 54.202(a)(3) and 4 CSR 240-3.570(2)(A)8. Applicant will satisfy all such standards. As part of its certification requirements for providing local exchange services, Applicant must abide by the service quality and consumer protection rules. In addition, Applicant commits to reporting information on an annual basis consistent with 47 C.F.R. § 54.422.

13. FCC Rules no longer require an applicant for ETC status to acknowledge that the FCC may require it to provide equal access to long distance carriers in the event that no other ETC is providing equal access within the service area.¹² However, pursuant to 4 CSR 240-3.570(2)(A)9,

¹¹ See *Lifeline and Link Up Reform Order* at ¶ 386; see also 47 C.F.R. § 54.202(a)(1)(ii).

¹² See *id.*

Applicant acknowledges it shall provide equal access pursuant to 110 and (4) if all other ETCs in the Designated Service Area relinquish their designations pursuant to section 214(e) of the Act.

14. An applicant for ETC designation is no longer required to demonstrate that it offers a local usage plan that is "comparable" to the plan offered by the ILEC in the relevant service territory.¹³ Nevertheless, in accordance with 4 CSR 240-3.570(2)(A)10, Applicant will offer a local usage plan comparable to the one offered by the incumbent ILEC in the service areas for which it seeks designation. Applicant will offer a local usage plan with unlimited calling within the customer's local calling area for a flat monthly fee with the same calling scope as AT&T. Applicant will provide Lifeline and Missouri USF (MoUSF) discounts pursuant to 4 CSR 240-31 at rates, terms and conditions comparable to the Lifeline and MoUSF offerings of the incumbent local exchange carrier providing service in the Designated Service Area.

15. In accordance with 47 C.F.R. § 54.202(a)(4), Applicant demonstrated its financial and technical capabilities in Case No. CA-2006-0373 referenced above.

16. Applicant will certify a customer's initial and annual eligibility for Lifeline in accordance with 47 C.F.R. § 54.410.

17. Applicant commits to comply with the Commission's service requirements applicable to ETCs set forth in 4 CSR 240-3.570(3).

IV. Granting YMAX's Application Will Serve the Public Interest

18. Congress requires that the Commission grant competitive ETC applications in non-rural areas.¹⁴ No specific public interest test is mentioned, as is the case for areas served by rural telephone companies.¹⁵ Thus, the Act provides that the Commission "shall" designate Applicant as

¹³ See *Lifeline and Link Up Reform Order* at page 208, revised § 54.202(a).

¹⁴ See 47 U.S.C. 214(e)(2).

¹⁵ See *Id.*

an ETC upon finding that the company meets the requirements of Section 54.101(a) and Section 54.202(a) of the FCC's Rules (47 C.F.R. § 54.101(a) and 47 C.F.R. § 54.202(a)).

19. Granting of Applicant's Application will serve the public interest and the market as a whole by promoting additional deployment of its unique service offering to the unserved and underserved exchanges in the Designated Service Area and will allow Applicant to participate in and offer Lifeline to qualifying consumers throughout these same exchanges. As relevant to the Commission's public interest inquiry, Applicant's presence will undeniably include a benefit of increased customer choice, as its service is unique, and serves a specific sector of the public who might well not otherwise be able to obtain wire line service from traditional providers.

20. The unique advantages and disadvantages of Applicant's service offering are as follows:

- a) The services are offered to customers on a monthly basis.
- b) Services are provided without requiring a security deposit or gaining credit worthiness.
- c) Customers have the opportunity to choose products based on current needs and change products, if necessary, on a monthly basis without incurring large costly fees.
- d) Applicant's offering provides long distance calling which eliminates the billing of additional monthly fees.
- e) Services can be discontinued simply by nonpayment of the next month's services without penalty or disconnection fees.

21. A central purpose of the Telecommunications Act of 1996 was to "promote competition and reduce regulation ... [thereby securing] lower prices and higher quality services ...

and encourage the rapid deployment of new telecommunications technologies.”¹⁶ Designation of Applicant as an ETC would further these goals. Granting ETC status to Applicant would allow the Applicant to obtain federal universal service support, which it will use to offer innovative telecommunications services at competitive prices to consumers in the Designated Service Area.

22. Applicant will publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Missouri residents will be made aware of the opportunities afforded to them under the Lifeline program and will be able to take advantage of those opportunities by subscribing to Applicant’s service.

23. Since Applicant provides service exclusively to credit challenged customers who generally cannot obtain service from the ILEC, the granting of ETC status is clearly in the public interest, because the services are simply not available to a significant portion of the eligible low income consumers. To the best of Applicant’s knowledge, Lifeline services are not being sufficiently advertised and made available to eligible low income consumers in the Designated Service Area, and statistics suggest that there are many eligible customers who are not yet aware of the programs. According to the best data available to Applicant, as of December 31, 2010, fewer than 20 percent of Missouri consumers eligible for Lifeline Services were being provided such services.¹⁷ When additional carriers enter the market with programs designed specifically for such customers, it increases the likelihood that eligible customers will become generally aware of these valuable options for telecommunications service.

24. Since Applicant does not seek designation below the study area level of a rural telephone company, no “cream skimming” analysis is required.

¹⁶ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

¹⁷ See attached Exhibit 3, 2010 Lifeline Participation Rates by State, which was obtained from the Universal Service Administrative Company (“USAC”), an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the FCC.

25. Applicant has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates which action, judgment or decision has occurred within three (3) years of the date of this application.

26. Applicant has no overdue annual report or assessment fees.

VI. Relief Requested

For the foregoing reasons, Applicant respectfully requests that the Commission grant its Application and designate Applicant as an ETC for the Designated Service Area.

Respectfully submitted,

BRYAN CAVE LLP

By /s/ Diana Vuylsteke

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GA Bar No. 678222

Attorneys for YMAX Communications Corp.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 21st day of December, 2012, to General Counsel and Office of Public Counsel.

/s/ Diana Vnylsteke

List of Exhibits

- | | |
|------------------|--|
| Exhibit 1 | Missouri Articles of Incorporation, Certificate of Authority and
Certificate of Good Standing |
| Exhibit 2 | Wire Centers |
| Exhibit 3 | 2010 Lifeline Participation Rates by State |

**Exhibit 1 Missouri Articles of Incorporation, Certificate of Authority and Certificate of
Good Standing**



State of Missouri

Robin Carnahan, Secretary of State

Corporations Division
P.O. Box 778 / 600 W. Main Street, Rm 322
Jefferson City, MO 65102

File Number: 200605511216
F00719862
Date Filed: 02/24/2006
Robin Carnahan
Secretary of State

Application for Certificate of Authority For a Foreign For-Profit Corporation

(Submit with filing fee of \$155.00)

- The corporation's name is YMax Communications Corp.
and it is organized and existing under the laws of Delaware
- The name it will use in Missouri is _____
- The date of its incorporation was May 24, 2005, and the period of its duration is perpetual
month/day/year
- The address of its principal place of business 223 Sunset Avenue, Suite 223 Palm Beach, FL 33480
Address City/State/Zip
- The name and physical address of its registered agent and office in the State of Missouri is
CT Corporation System 120 South Central Avenue Clayton, MO 63105
Name Address City/State/Zip
- The specific purpose(s) of its business in Missouri are:
Information and communication services and equipment provider
- The name of its officers and directors and their business addresses are as follows:

Officers	Name	Address	City/State/Zip
President	<u>Daniel M. Borislow</u>	<u>223 Sunset Avenue, Suite 223</u>	<u>Palm Beach, FL 33480</u>
Vice President	<u>Peter J. Russo</u>	<u>223 Sunset Avenue, Suite 223</u>	<u>Palm Beach, FL 33480</u>
Secretary	<u>Peter J. Russo</u>	<u>223 Sunset Avenue, Suite 223</u>	<u>Palm Beach, FL 33480</u>
Treasurer	<u>Peter J. Russo</u>	<u>223 Sunset Avenue, Suite 223</u>	<u>Palm Beach, FL 33480</u>

Board of Directors

Director	<u>Daniel M. Borislow</u>	<u>223 Sunset Avenue, Suite 223</u>	<u>Palm Beach, FL 33480</u>
Director	<u>Peter J. Russo</u>	<u>223 Sunset Avenue, Suite 223</u>	<u>Palm Beach, FL 33480</u>
Director	_____	_____	_____
Director	_____	_____	_____
Director	_____	_____	_____

Name and address to return filed document:

Name: _____
Address: _____
City, State, and Zip Code: _____

State of Missouri
Creation - General Business - Foreign 3 Page(s)



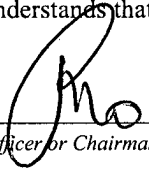
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8. The effective date of this document is the date it is filed by the Secretary of State of Missouri, unless you indicate a future date, as follows: _____

(Date may not be more than 90 days after the filing date in this office)

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

	Peter J. Russo	Vice President	2/21/06
<i>Must be an Officer or Chairman listed in #7, above</i>	<i>Printed Name</i>	<i>Title</i>	<i>Date</i>

Note: You must submit current original certificate of good standing or certificate of existence with this application. This may be obtained from your Secretary of State or other authority that issues corporate charters.

Delaware

PAGE 1

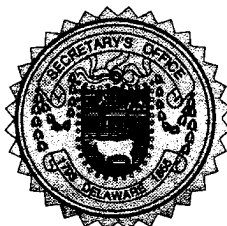
The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "YMAX COMMUNICATIONS CORP." IS DULY INCORPORATED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL CORPORATE EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE TWENTY-THIRD DAY OF FEBRUARY, A.D. 2006.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "YMAX COMMUNICATIONS CORP." WAS INCORPORATED ON THE TWENTY-FOURTH DAY OF MAY, A.D. 2005.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL REPORTS HAVE BEEN FILED TO DATE.

AND I DO HEREBY FURTHER CERTIFY THAT THE FRANCHISE TAXES HAVE BEEN PAID TO DATE.



Harriet Smith Windsor

Harriet Smith Windsor, Secretary of State

3975300 8300

AUTHENTICATION: 4543898

060173050

DATE: 02-23-06

State of Missouri



Robin Carnahan
Secretary of State

CERTIFICATE OF AUTHORITY

WHEREAS,

YMAX COMMUNICATIONS CORP.
F00719862

using in Missouri the name

YMAX COMMUNICATIONS CORP.

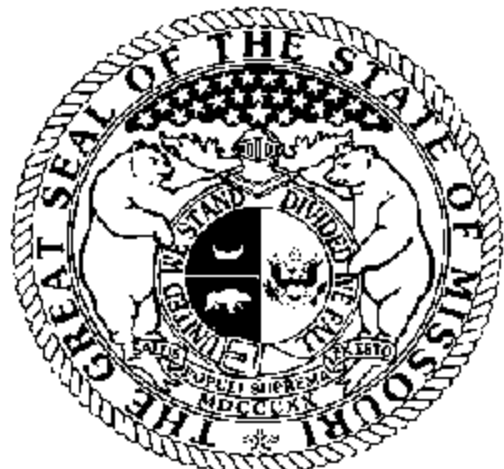
has complied with the General and Business Corporation Law which governs Foreign Corporations; by filing in the office of the Secretary of State of Missouri authenticated evidence of its incorporation and good standing under the Laws of the State of Delaware.

NOW, THEREFORE, I, ROBIN CARNAHAN, Secretary of State of the State of Missouri, do hereby certify that said corporation is from this date duly authorized to transact business in this State, and is entitled to all rights and privileges granted to Foreign Corporations under the General and Business Corporation Law of Missouri.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 24th day of February, 2006.

A handwritten signature in cursive script that reads "Robin Carnahan".

Secretary of State



STATE OF MISSOURI



Robin Carnahan
Secretary of State

**CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING**

I, ROBIN CARNAHAN, Secretary of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

YMAX COMMUNICATIONS CORP.

using in Missouri the name

**YMAX COMMUNICATIONS CORP.
F00719862**

a DELAWARE entity was created under the laws of this State on the 24th day of February, 2006, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 21st day of December, 2012



Secretary of State

Certification Number: 15092916-1 Reference:

Verify this certificate online at <https://www.sos.mo.gov/businessentity/soskb/verify.asp>



Exhibit 2 Wire Centers

STATE	SAC	ILEC	CLLI	WIRE CENTER NAME
MO	425213	SBC	ADRNMOAX	ADRIAN
MO	425213	SBC	ADVNMORA	ADVANCE
MO	425213	SBC	AGNCMOAL	AGENCY
MO	425213	SBC	ANTOMO50	ANTONIA
MO	425213	SBC	ARCHMOAX	ARCHIE
MO	425213	SBC	ARGYMOPA	ARGYLE
MO	425213	SBC	ARMSMOCR	ARMSTRONG
MO	425213	SBC	ASGVMOOR	ASH GROVE
MO	425213	SBC	BLCYMORE	BELL CITY
MO	425213	SBC	BLDLMOGU	BLOOMSDALE
MO	425213	SBC	BLFDMOLO	BLOOMFIELD
MO	425213	SBC	BLNGMOMY	BILLINGS
MO	425213	SBC	BLSPMOCA	BLUE SPRINGS
MO	425213	SBC	BNTNMOKI	BENTON
MO	425213	SBC	BNTRMOFL	BONNE TERRE
MO	425213	SBC	BNVLMOTU	BOONVILLE
MO	425213	SBC	BRFDMOCL	BROOKFIELD
MO	425213	SBC	BSMRMOPE	BISMARCK
MO	425213	SBC	BUFTMOHU	BEAUFORT
MO	425213	SBC	BWLGMOEa	BOWLING GREEN
MO	425213	SBC	CDHLM051	CEDAR HILL
MO	425213	SBC	CDWLMOOL	CARDWELL
MO	425213	SBC	CHFDM052	CHESTERFIELD
MO	425213	SBC	CHFFMOTU	CHAFFEE
MO	425213	SBC	CHLCMOMI	CHILLICOTHE
MO	425213	SBC	CHTNMOMU	CHARLESTON

MO	425213	SBC	CLSPMOFI	CLIMAX SPRINGS,NORTH
MO	425213	SBC	CLSPMONO	CLIMAX SPRINGS,SOUTH
MO	425213	SBC	CLVLMOCI	CLARKSVILLE
MO	425213	SBC	CLVRMOLU	CLEVER
MO	425213	SBC	CMPBMOCH	CAMPBELL
MO	425213	SBC	CMTNMODI	CAMDENTON SOUTH
MO	425213	SBC	CMTNMONO	CAMDENTON NORTH
MO	425213	SBC	CNTRMOAM	CENTER
MO	425213	SBC	CPGRMOED	CAPE GIRARDEAU
MO	425213	SBC	CRJTMOMI	CARL JUNCTION
MO	425213	SBC	CRTHMOFL	CARTHAGE
MO	425213	SBC	CRTNMOLI	CARROLLTON
MO	425213	SBC	CTVLMOED	CARUTHERSVILLE
MO	425213	SBC	DELTMOBW	DELTA
MO	425213	SBC	DESTMOGI	DE SOTO
MO	425213	SBC	DRNGMOPL	DEERING
MO	425213	SBC	DWNGMOFR	DOWNING
MO	425213	SBC	DXTRMOMA	DEXTER
MO	425213	SBC	EDINMOEX	EDINA
MO	425213	SBC	ELDNMOEX	ELDON
MO	425213	SBC	ELSBMOTW	ELSBERRY
MO	425213	SBC	EPRRMONI	EAST PRAIRIE
MO	425213	SBC	ESSXMOAV	ESSEX
MO	425213	SBC	EURKMO53	EUREKA
MO	425213	SBC	EXSPMOME	EXCELSIOR SPRINGS
MO	425213	SBC	FEBGMORI	FREEBURG
MO	425213	SBC	FISKMOWO	FISK

MO	425213	SBC	FLRVMOGE	FLAT RIVER
MO	425213	SBC	FLTNMOMI	FULTON
MO	425213	SBC	FNTNMO54	FENTON
MO	425213	SBC	FRFRMOST	FRANKFORD
MO	425213	SBC	FRGVMOPL	FAIR GROVE
MO	425213	SBC	FRHNMOTA	FROHNA
MO	425213	SBC	FRTNMOPL	FARMINGTON
MO	425213	SBC	FRTWMOST	FREDERICKTOWN
MO	425213	SBC	FSTSMOYE	FESTUS
MO	425213	SBC	FYTTMOCH	FAYETTE
MO	425213	SBC	GIDNMOHI	GIDEON
MO	425213	SBC	GLSGMOFE	GLASGOW
MO	425213	SBC	GRMLMOFR	GRAVOIS MILLS
MO	425213	SBC	GRSMMO55	GRAY SUMMIT
MO	425213	SBC	HAYTMOFL	HAYTI
MO	425213	SBC	HGRGMO56	HIGH RIDGE
MO	425213	SBC	HGRGMO57	HOUSE SPRINGS
MO	425213	SBC	HIGBMOGL	HIGBEE
MO	425213	SBC	HLBOMO66	HILLSBORO
MO	425213	SBC	HLCMMOSW	HOLCOMB
MO	425213	SBC	HNBLMOAC	HANNIBAL
MO	425213	SBC	HRNVMOPE	HORNERSVILLE
MO	425213	SBC	HSBNMOHB	LAKE OZARK
MO	425213	SBC	HVTRMO65	WELDON SPRINGS
MO	425213	SBC	HVTRMO67	HARVESTER
MO	425213	SBC	IMPRMO58	IMPERIAL
MO	425213	SBC	JCSNMOCI	JACKSON

MO	425213	SBC	JPLNMOMA	JOPLIN
MO	425213	SBC	JSPRMOEX	JASPER
MO	425213	SBC	KKVLMOMO	KIRKSVILLE
MO	425213	SBC	KNNSMOLO	KNOB NOSTER
MO	425213	SBC	KNNTMOTU	KENNETT
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MO	425213	SBC	KSCYMO21	NASHUA
MO	425213	SBC	KSCYMO22	KANSAS CITY
MO	425213	SBC	KSCYMO23	INDEPENDENCE
MO	425213	SBC	KSCYMO24	KANSAS CITY
MO	425213	SBC	KSCYMO25	RAYTOWN
MO	425213	SBC	KSCYMO40	KANSAS CITY
MO	425213	SBC	KSCYMO41	BELTON
MO	425213	SBC	KSCYMO42	LEES SUMMIT
MO	425213	SBC	KSCYMO44	LIBERTY
MO	425213	SBC	KSCYMO45	KANSAS CITY
MO	425213	SBC	KSCYMO48	KANSAS CITY
MO	425213	SBC	KSCYMO55	INDEPENDENCE
MO	425213	SBC	LAMRMOOV	LAMAR
MO	425213	SBC	LAMTMODI	LAMONTE
MO	425213	SBC	LCWDMOCE	LOCKWOOD
MO	425213	SBC	LDWDMOLO	LEADWOOD
MO	425213	SBC	LINNMTOTW	LAKE OZARK

MO	425213	SBC	LLBRMOOV	LILBOURN
MO	425213	SBC	LNCSMOGL	LANCASTER
MO	425213	SBC	LOSNMOSK	LOUISIANA
MO	425213	SBC	MBRLMOAM	MOBERLY
MO	425213	SBC	MCCKMOEM	MACKS CREEK
MO	425213	SBC	METAMOBA	META
MO	425213	SBC	MEXCMOJU	MEXICO
MO	425213	SBC	MLDNMOCR	MALDEN
MO	425213	SBC	MNCHMO59	MANCHESTER
MO	425213	SBC	MNTTMOBE	MONETT
MO	425213	SBC	MRCLMOCH	MARCELINE
MO	425213	SBC	MRHLMOBE	MARBLE HILL
MO	425213	SBC	MRHSMONO	MOREHOUSE
MO	425213	SBC	MRNVMOHO	MARIONVILLE
MO	425213	SBC	MRSHMOGA	MARSHALL
MO	425213	SBC	MRTNMONI	MARSTON
MO	425213	SBC	MTCYMOLO	MONTGOMERY CITY
MO	425213	SBC	MXVLMO60	MAXVILLE
MO	425213	SBC	NESHMOGL	NEOSHO
MO	425213	SBC	NEVDMONO	NEVADA
MO	425213	SBC	NIXAMOAA	NIXA
MO	425213	SBC	NWFRMOVI	NEW FRANKLIN
MO	425213	SBC	NWMDMOSH	NEW MADRID
MO	425213	SBC	OKRGMOAM	OAK RIDGE
MO	425213	SBC	OLAPMOST	OLD APPLETON
MO	425213	SBC	ORANMOCO	ORAN
MO	425213	SBC	OSBHMOFI	OSAGE BEACH

MO	425213	SBC	PATNMOTO	PATTON
MO	425213	SBC	PCFCMO61	PACIFIC
MO	425213	SBC	PCHNMOTE	POCAHONTAS
MO	425213	SBC	PGVLMODR	PORTAGEVILLE
MO	425213	SBC	PONDMO62	POND
MO	425213	SBC	PPBLMOSU	POPLAR BLUFF
MO	425213	SBC	PRCYMOGR	POPLAR BLUFF
MO	425213	SBC	PRSXMO68	PIERCE CITY
MO	425213	SBC	PRVLMOLI	PORTAGE DES SIOUX
MO	425213	SBC	PUXCMOAC	PERRYVILLE
MO	425213	SBC	PUXCMOWE	PUXICO
MO	425213	SBC	PVLYMOAA	PEVELY
MO	425213	SBC	PYVLMOTI	PAYNESVILLE
MO	425213	SBC	QULNMOFA	QULIN
MO	425213	SBC	RCMDMOPR	RICHMOND
MO	425213	SBC	RCWDMOOR	RICHWOODS
MO	425213	SBC	RISCMOEX	RISCO
MO	425213	SBC	RPBLMOPE	REPUBLIC
MO	425213	SBC	RRVLMOPL	ROGERSVILLE
MO	425213	SBC	RUVLMORA	RUSHVILLE
MO	425213	SBC	SCCYMOCO	SCOTT CITY
MO	425213	SBC	SDLIMOTA	SEDALIA
MO	425213	SBC	SENTMORE	SENATH
MO	425213	SBC	SGNVMOTU	STE GENEVIEVE
MO	425213	SBC	SKSTMOGR	SIKESTON
MO	425213	SBC	SLTRMOLA	SLATER
MO	425213	SBC	SMVLMOTR	SMITHVILLE

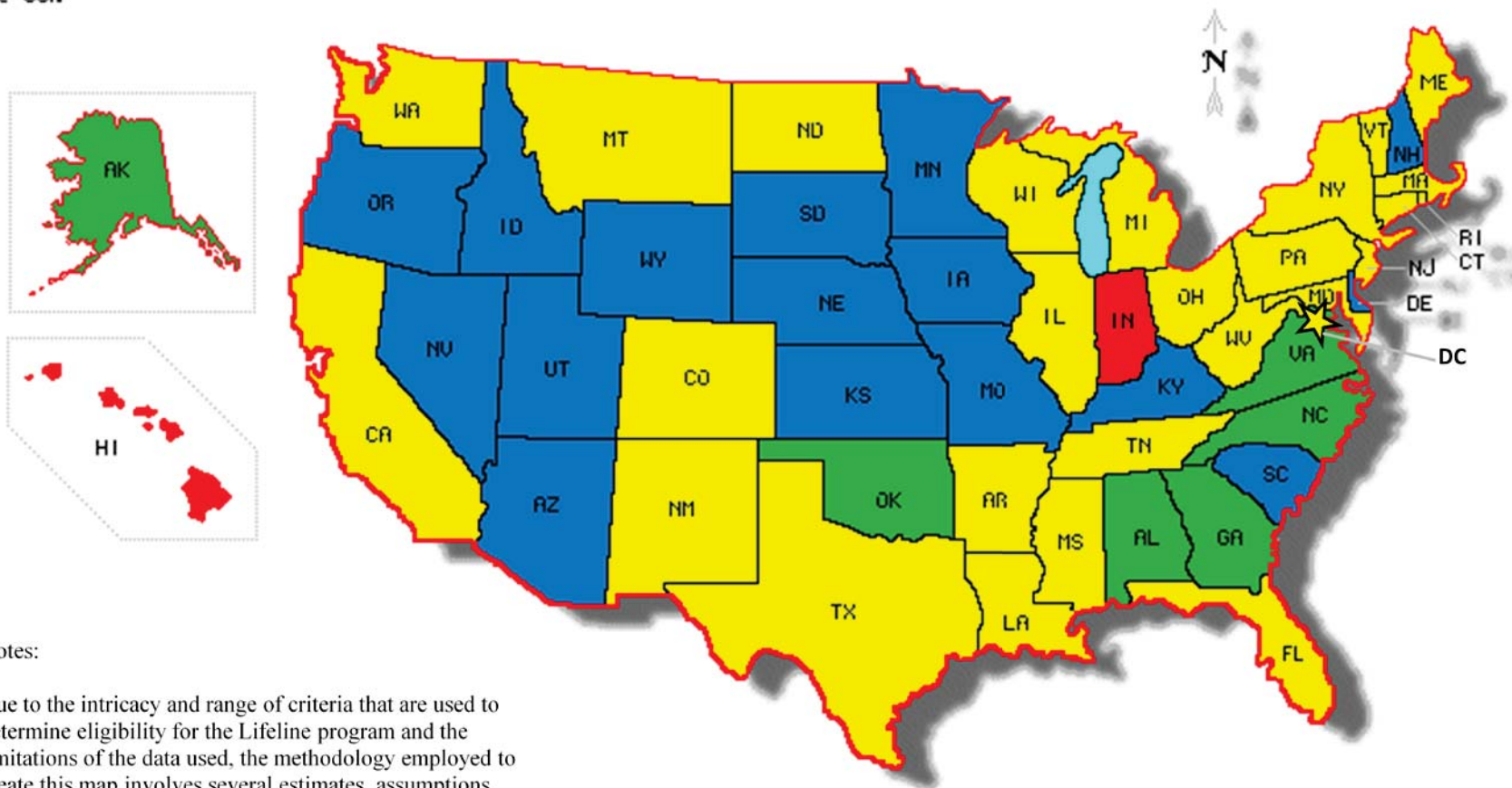
MO	425213	SBC	SNANMOMO	SAN ANTONIO
MO	425213	SBC	SNBHMOFR	SUNRISE BEACH
MO	425213	SBC	SPFDMOMC	SPRINGFIELD
MO	425213	SBC	SPFDMOTE	SPRINGFIELD
MO	425213	SBC	SPFDMOTU	SPRINGFIELD
MO	425213	SBC	STCHMO63	ST CHARLES
MO	425213	SBC	STCLMOMA	ST CLAIR
MO	425213	SBC	STFRMORE	STRAFFORD
MO	425213	SBC	STJSMODJ	ST JOSEPH
MO	425213	SBC	STJSMODN	ST. JOSEPH
MO	425213	SBC	STJSMOMD	ST JOSEPH
MO	425213	SBC	STLSMO01	ST LOUIS
MO	425213	SBC	STLSMO02	ST LOUIS
MO	425213	SBC	STLSMO03	ST LOUIS
MO	425213	SBC	STLSMO04	ST LOUIS
MO	425213	SBC	STLSMO05	ST LOUIS
MO	425213	SBC	STLSMO06	ST LOUIS
MO	425213	SBC	STLSMO07	ST LOUIS
MO	425213	SBC	STLSMO08	ST LOUIS
MO	425213	SBC	STLSMO11	ST LOUIS
MO	425213	SBC	STLSMO20	
MO	425213	SBC	STLSMO21	FERGUSON
MO	425213	SBC	STLSMO22	ST LOUIS
MO	425213	SBC	STLSMO23	ST LOUIS
MO	425213	SBC	STLSMO24	OVERLAND
MO	425213	SBC	STLSMO25	ST LOUIS
MO	425213	SBC	STLSMO26	ST LOUIS

MO	425213	SBC	STLSMO27	ST LOUIS
MO	425213	SBC	STLSMO40	ST LOUIS
MO	425213	SBC	STLSMO41	FLORISSANT
MO	425213	SBC	STLSMO42	KIRKWOOD
MO	425213	SBC	STLSMO43	BRIDGETON
MO	425213	SBC	STLSMO45	HAZELWOOD
MO	425213	SBC	STLSMOAA	MARYLAND HEIGHTS
MO	425213	SBC	STMYMOLI	ST MARYS
MO	425213	SBC	STNBMOSU	STANBERRY
MO	425213	SBC	TRENMOEL	TRENTON
MO	425213	SBC	TSCMMOEM	TUSCUMBIA
MO	425213	SBC	TWACMOAB	CREVE COEUR
MO	425213	SBC	UNINMOLU	UNION
MO	425213	SBC	VINNMOGA	VIENNA
MO	425213	SBC	VRSLMODR	VERSAILLES
MO	425213	SBC	VYPKMO64	VALLEY PARK
MO	425213	SBC	WARDMOMA	WARDELL MAYFAIR
MO	425213	SBC	WAREMOWH	WARE
MO	425213	SBC	WASHMOBE	WASHINGTON
MO	425213	SBC	WBCYMOOR	WEBB CITY
MO	425213	SBC	WLGVMOWY	WALNUT GROVE
MO	425213	SBC	WLRDMOSH	WILLARD
MO	425213	SBC	WLVLMOMU	WELLSVILLE
MO	425213	SBC	WPHLMOGL	WESTPHALIA
MO	425213	SBC	WYTTMOOR	WYATT

Exhibit 3 2010 Lifeline Participation Rates by State

- - Below 10%
- - 10% - 20%
- - 20% - 50%
- - Above 50%

2010 Lifeline Participation Rates by State



Notes:

Due to the intricacy and range of criteria that are used to determine eligibility for the Lifeline program and the limitations of the data used, the methodology employed to create this map involves several estimates, assumptions, simplifications, and omissions. Therefore, the rates generated on this map should be treated as estimates only.