

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

In the Matter of the Application of Air Link Rural)
Broadband, L.L.C. for Designation as an Eligible)
Telecommunications Carrier in the State of Missouri) Case No. DA-2019-0102

**SUPPLEMENTAL FILING TO THE APPLICATION AND VERIFICATION OF
AIR LINK RURAL BROADBAND, L.L.C.
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE
STATE OF MISSOURI**

I. INTRODUCTION

Air Link Rural Broadband, L.L.C. (“Air Link” or the “Company”), by its undersigned counsel, and 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 240.31.130, hereby submits these supplemental statements to its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri.

Air Link makes this Supplemental Filing to satisfactorily address additional points raised by Ms. Kari Salsman of the Commission Staff on October 18, 2018, as well as to address network architecture issues raised by Mr. Jonathan Chambers of Conexon, LLC, in Conexon’s November 14, 2018 Application to Intervene in Commission Case No. DA-2019-0102, and finally to specifically address issues relevant to state ETC designations noted in a December 18, 2018 email sent to all FCC Auction 903 awardees.

All correspondence, communication, pleadings, notices, orders, and decisions relating to this Application should be addresses to:

Amanda Grellner McCuskey Law Office
Attorney for Air Link Rural Broadband, L.L.C.
106 E. Main Street
Linn, MO 65051
Phone: (573) 897-3101
Fax: (573) 897-4697
Email: agrellner@sbcglobal.net

this Application should be addresses to:

or to:

Bob Abrams, BKD, LLP
Consultant to Air Link Rural Broadband, L.L.C.
8517 Excelsior Dr., Suite 301
Madison, WI 53717
Phone: (608) 410-4768
Fax: (608) 664-9112
Email: rabrams@bkd.com

II. RESPONSES TO MPSC INFORMATION REQUEST

On October 18, 2018, the Missouri Public Service Commission Staff emailed Air Link Rural Broadband, L.L.C. seeking additional detail on the Company's request for designation as an Eligible Telecommunications Carrier (ETC) in the state of Missouri. High cost support recipients, including recipients of funding pursuant to the CAF Phase II Auction, must satisfy Lifeline service obligations. In its responses below, the Company is clear in its statements that its request for ETC designation will include the offering of Lifeline service and comply with Lifeline obligations in full satisfaction of applicable MoPSC rules and Missouri statutes.

These responses are respectfully submitted:

1. 4 CSR 240-2.060(1)(B)-(G): Provide documentation about the company's legal organization (i.e., Missouri Secretary of State's documentation).

A copy of Air Link Rural Broadband, L.L.C.'s Missouri Articles of Organization, dated 15 April, 2011, appear as **Attachment A** to this filing.

2. 4 CSR 240-2.060(1)(K): The identity of any pending action or final unsatisfied judgments or decisions against the company 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 the application. If there is not any pending actions or final unsatisfied judgments or decisions against the company then provide a statement to that effect.

Air Link Rural Broadband, L.L.C. affirmatively states there are no pending actions or final unsatisfied judgements or decisions against the company from any state or federal agency or court with involve customer service or rates, which action, judgement, or decision has occurred within three years of the date of this application.

3. 4 CSR 240-31.130(1)(B)8: A description about the rates, terms, conditions of the supported services. Indicate how such information will be maintained. If such information will be maintained on a publicly available website then provide the website address.

The Company will, as a condition of receiving its federal support as an ETC, offer voice telephony as a standalone service throughout their designated service area and must offer voice telephony services at rates that are reasonably comparable to urban rates. It will do consistent with the FCC's *USF/ICC Transformation Order*, 26 FCC Rcd at 17693, paras. 80-81; and 47 CFR § 54.101(b). The Company will also meet its broadband service obligations under a similar reasonable comparability rate certification requirement, according to the FCC's *Connect America Fund et al.*, WC Docket No. 10-90 et al., Report and Order, 29 FCC Rcd 15644, 15686-87, para. 120 (2014) (*December 2014 CAF Order*). These requirements are as described on page 3 of [FCC Public Notice DA 18-274](#).

Rates, terms and conditions of voice and broadband services will be available on the Company's website at the time of offering, as well as service application information for regular and low-income program services, <http://www.airlinkrb.com/>. Air Link will file ETC notices as required by the Commission and the FCC, and agrees to file local service tariffs with the Commission as required at the time of services.

Subject to the forgoing, because it will be some time before its fiber-to-the-premises network build it far enough along to offer first services, the Company wishes to delay statements on the specific rates it will charge.

4. 4 CSR 240-31.130(1)(C)1: The identity any individual or entity having a ten percent (10%) or more ownership interest in the applicant, and all managers, officers, and directors, or any person exerting managerial control over the applicant's day-to-day operations, policies, service offerings, and rates. If no individual or entity has a 10% or more ownership interest in the applicant then provide a statement to that effect.

Air Link Rural Broadband, L.L.C. has two members. Applicant Casey Imgarten is a 50% owner and Vicki Imgarten is a 50% owner of the L.L.C.

5. 4 CSR 240-31.130(1)(C)2: The identity of any companies sharing common ownership or management with the applicant. For any identified company, indicate whether the company has ever received funds from the Federal Universal Service Fund (FUSF) or any state universal service fund. If no company shares common ownership or management with the applicant then provide a statement to that effect.

No other companies or business concerns have any common ownership or management of Air Link Rural Broadband, L.L.C.

6. 4 CSR 240-31.130(1)(E)3: A statement that the applicant is compliant with contribution obligations to the Federal USF.

Air Link Rural Broadband, L.L.C. is compliant with federal USF contribution obligations.

At the time of application, Air Link Rural Broadband, L.L.C. is *de minimis* with respect to federal USF contribution obligations. The Company's FCC Form 499 Filer Identification number is 829839. Air Link commits to remain compliant with Federal USF contribution obligations.

7. 4 CSR 240-31.130(1)(D): All ETC applications shall contain the following information and commitments regarding the applicant's proposed participation in the Lifeline or Disabled program:

- a) Certify funding will flow through to the subscriber.

Air Link Rural Broadband, L.L.C. certifies that all received Lifeline and Disabled program revenues it receive will flow through to its eligible subscribers, according to the rules of these programs.

- b) Commit to solely conduct business under name granted for ETC status. This commitment should include a statement the company will not use additional service or brand names

Air Link Rural Broadband, L.L.C. commits to solely conduct business under the name for which it has been granted ETC designation, and will use no additional service or brand names.

- c) Commit to comply with all FCC Lifeline program rules (47 CFR Part 54 Subpart E).

Air Link Rural Broadband, L.L.C. commits to comply with all applicable FCC Lifeline program rules in 47 CFR Part 54 Subpart E.

- d) Commit to comply with all MoPSC Lifeline program requirements whether funded solely through the FUSF or through the FUSF and the Missouri Universal Service Fund (MoUSF)

Air Link Rural Broadband, L.L.C. commits to comply with all MoPSC Lifeline program requirements, whether funded solely through the FUSF or through the FUSF and the MoUSF.

- e) Demonstrate how applicant will ensure funding will flow thru to subscriber.

Air Link Rural Broadband, L.L.C. will establish line item amounts on its billing platform for these credits and/or automated billing logic that directs appropriate credits to its individual qualifying subscribers. It also commits to work with its independent audit firm to establish an audit test that confirms full flow through of Lifeline and Disability program funding.

- f) A statement indicating whether the applicant intends to seek support from the MoUSF. If so, state whether the company intends to participate in the Disabled program

Air Link Rural Broadband, L.L.C. has not yet determined if it will qualify for MoUSF support Lifeline program, or if it can qualify for participation in the Disabled program due to the small initial ETC service territory it will occupy. The company will meet all Commission requirements and rules of the Disabled program if it becomes a participant.

- g) Copy of Disabled program enrollment form, if will be participating in that program.

A provisional draft of the Disabled program enrollment form appears as **Attachment B** of this filing. Air Link Rural Broadband, L.L.C. would use of form in the then-current format, based on its ability to participate and qualification for these programs.

- h) Explain how company will initiate Lifeline service to the subscriber including: How the company will ensure a subscriber meets eligibility requirements, determine if a subscriber's identity and primary address are correct and how the company will ensure that only one (1) Lifeline or Disabled discount is received per household.

Air Link Rural Broadband, L.L.C. will follow federal and MoPSC Lifeline rules for determining eligibility and recertification requirements. It will make use of the federal NLAD (National Lifeline Accountability Database), NV (National Verifier) managed by USAC (Universal Service Administrative Company), and utilize USAC's annual recertification service. By carefully reviewing its submissions and all information on forms received from prospective program subscribers, it will ensure that only one Lifeline or Disabled service credit is received per eligible household.

- i) If the company does not charge a monthly fee for Lifeline service, explain how it will comply with FCC requirements that the company will not receive universal service support until the subscriber activates the service and de-enrollment for non-usage as provided in 47 CFR 54.405(e)(3).

Air Link Rural Broadband, L.L.C. expects to both charge a monthly fee for Lifeline service to eligible subscribers, and to provide the appropriate monthly credit to those eligible subscribers. Subscribers who are deactivated or de-enrolled will not receive Lifeline credits, according to the rules of the program.

- j) Explain how company will comply with annual verification process, including what action will be taken if a subscriber fails to adequately respond or is no longer eligible for support.

Air Link Rural Broadband, L.L.C. will comply with the annual federal verification process through accurate and timely submission of FCC Form 555, due each January 31, and covering subscribers in each of the previous twelve months. The Company will likewise submit to all MoPSC verification processes for programs for which it participates.

- k) Indicate whether agents or independent contractors will be used to enroll subscribers. If non-employees are going to be used include a statement committing to take responsibility for them and their activities as if they were legally employees of the company. In addition, explain how it will monitor such personnel to ensure compliance with all applicable laws and rules concerning the Lifeline or Disabled programs.

If Air Link Rural Broadband, L.L.C. determines it appropriate to use any independent contracts to enroll subscribers, each contractor will be required to take the same full responsibility for their activities as the employees of the Company. It will be clear at all time that services are to be provided by, and under rates, terms and conditions of, Air Link Rural Broadband, L.L.C.

If independent contractors are retained, they will be trained according to federal requirements regarding FCC Customer Network Proprietary Information (CPNI) rules, discipline and best practices, Federal Trade Commission Red Flag Rules regarding identity theft risks, monitored for quarterly performance and receive regular individual customer service reviews

8. A statement that standalone voice service will be offered. This requirement is based on the FCC's expectations for ETC applications as identified on page 3 of [FCC Public Notice DA 18-274](#).

Air Link Rural Broadband, L.L.C. certifies it will offer a standalone voice service to any requesting location within its ETC service area. It will do so in a manner fully consistent

with expectations provided in FCC Public Notice DA 18-274.

A detailed version of this statement has been made in response to the Commission Staff's Question 3, above.

9. Demonstrate the rates for the supported services will be reasonably comparable to the rates offered in urban areas. This requirement is based on the FCC's expectations for ETC applications as identified on page 3 of [FCC Public Notice DA 18-274](#).

Air Link Rural Broadband, L.L.C. has offered a detailed version of this statement in response to the Commission Staff's Question 3, above.

III. COMMENTS RELEVANT TO CONEXON, LLC'S APPLICATION TO INTERVENE IN AIR LINK RURAL BROADBAND, LLC'S APPLICATION

On November 14, 2018, Conexon, LLC filed an application to intervene in the Company's request for ETC designation, MoPSC Case No. DA-2019-0102.

Air Link subsequently spoke by telephone with Mr. Jonathan Chambers of Conexon to explain the network platform it intends to use in areas for which it receives ETC designation from the Commission. A summary of comments made to Mr. Chambers follows. At the end of this discussion, Mr. Chambers offered his conditional satisfaction with Air Link's responses to Conexon's intervention concerns.

Summary points made to Conexon and to the Commission by Air Link:

- Air Link's successful CAF Phase II Auction 903 application and subsequent award of federal high cost support are based on the joint provision of voice services and broadband services that are "above baseline" (*i.e., capable of delivering speeds of at least 100 Mbps downlink and 20 Mbps uplink*) and at "low latency" (*i.e., with latency of 100 milliseconds or less*). Air Link states that its application and buildout commit to these positions for its ETC area offerings, for

all requesting locations within its list of awarded census blocks, and in particular to meet its commitments to FCC subscription milestone timelines.

- Air Link believes that its “above baseline” commitments to provide a reliable broadband service meet these obligations will require a fiber-to-the-premises access method.
- So there is no misunderstanding on this issue, the network design Air Link submitted to the FCC as part of its CAF Phase II Auction 903 application materials specifies exclusive use of a fiber-to-the-premises buildout. Air Link has committed to exclusively use a fiber-to-the-premises access technology to insure all Auction 903-award locations, for which Air Link has sought ETC designation from the FCC and the Commission, can reliably take broadband services meeting the conditions of its federal support.
- For added emphasis, Air Link states its proposed use of fiber-to-the-premises technology was the basis of underlying costs in its successful Auction 903 application bids.
- To the extent Air Link may serve additional subscriber locations beyond the Auction 903 federal support area, Air Link would have to self-fund an expansion of this fiber-to-the-premises platform. It may also choose to expand its existing wireless Internet technology platform to reach those non-supported locations. The service platform for future buildouts would be future decisions.

IV. FCC EMAIL OF DECEMBER 18, 2018 REGARDING “ETC LIFELINE OBLIGATIONS FOR AUCTION 903 RECIPIENTS” SENT TO ALL AUCTION 903 AWARDEES SEEKING STATE ETC DESIGNATIONS

Air Link offers additional statements in the event the Commission has also received a copy of a very recent email from FCC Staff regarding Lifeline obligations of CAF Phase II Auction 903 awardees seeking state ETC designations. This email appears as **Attachment C** to this filing.

To respectfully paraphrase, federal supports—and specifically federal Lifeline supports—to Auction 903 awardees are limited to qualifying locations within the eligible census blocks for which applicants were awarded this limited support.

Air Link Rural Broadband, L.L.C. has applied for ETC designation from the Missouri Public Service Commission for only the census blocks for which it has obtained federal high cost and Lifeline support. Air Link intends to comply fully with its federal and state ETC obligations within the eligible census blocks referenced in its initial application, and not to expand its request to include non-eligible census blocks which may lie within the same census block group.

Air Link does not currently have plans to expand the geographical area of its ETC application into other areas already occupied by another MoPSC-designated ETC. Air Link recognizes that those other MoPSC-designated ETCs have made investments in voice networks, if not in high-speed broadband networks, that led to the FCC’s CAF Phase II reverse auction within their local exchange areas. Air Link recognizes that other ETCs have relinquished their obligations carrying the added costs of deploying high-speed broadband at this time.

V. DESIGNATION OF AIR LINK AS AN ETC WOULD PROMOTE THE PUBLIC INTEREST

Air Link re-states that its designation of Air Link as an ETC will serve the public interest by facilitating the goals of the FCC's CAF II program by deploying voice and very high-speed broadband networks in areas where access to broadband at forward-looking speeds is currently lacking. Under the 1996 Federal Communications Act, "upon request and consistent with the public interest, convenience and necessity" the state commission shall "designate more than one common carrier as an eligible telecommunications carrier for a service area designated" by the state commission. Air Link believes the public interest will be served by its ETC designation, and remains available to respond to any additional concerns of the Commission.

VI. CONCLUSION

Based on the evidence presented in Air Link's initial application, responses to Staff questions, and to issues raised by Conexon's intervention, Air Link requests that it be expeditiously granted ETC authority to enable it to receive the CAF II reverse auction funds it has been allocated.

Respectfully submitted,

AIR LINK RURAL BROADBAND, L.L.C.



Amanda Grellner
McCuskey Law Office
Attorney for Air Link Rural Broadband, L.L.C.
106 E. Main Street
Linn, MO 65051
(573) 897-3101

Dated: December 28, 2018

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 28th day of December 2018, to the following parties:

General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Office of Public Counsel
Governor Office Bldg., Suite 650
PO Box 2230
Jefferson City, MO 65102



Amanda Greffner
McCuskey Law Office

AFFIDAVIT & VERIFICATION

I, Casey Imgarten, a natural person, do hereby swear and affirm that I am an officer of Applicant and that the following information and statements are true and correct to the best of my knowledge and belief:

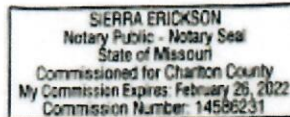
1. I am an authorized representative of Air Link Rural Broadband L.L.C. and acknowledge that I have the authority to execute this Affidavit and Verification on behalf of Air Link Rural Broadband, L.L.C. and have read the foregoing Application and certify that the foregoing Application is based upon information which is true and correct to the best of my knowledge.
2. Air Link Rural Broadband, L.L.C. certifies that it is a common carrier under §§214(e)(1)-(2) of the Communications Act as amended (the "Act").
3. Air Link Rural Broadband, L.L.C. commits to provide the services and functionalities required for designation as an Eligible Telecommunications Carrier ("ETC") in the census blocks wherein funds are being allocated to Air Link Rural Broadband, L.L.C. through the Connect America Fund ("CAF") Phase II reverse auction.
4. Air Link Rural Broadband, L.L.C. certifies that it will meet all of the applicable FCC requirements for designation as an ETC under the §214(e) of the Act and all applicable Commission requirements for designation as an ETC.
5. I am the corporate officer responsible for certifying Air Link Rural Broadband, L.L.C.'s use of federal high cost support. Air Link Rural Broadband, L.L.C. is eligible to be designated as an ETC within the meaning of §214(e) of the Act, and is eligible to receive universal support funding pursuant to §254(c) of the Act.
6. Air Link Rural Broadband, L.L.C. will use the federal high-cost support funds that it receives only to provide, deploy, upgrade and/or maintain facilities and services for which the support is intended.
7. Air Link Rural Broadband, L.L.C. will use all state support funds that it receives only to provide services for services, and disburse to subscribers, appropriate to those services.


Casey Frigarten
Principal, Air Link Rural Broadband, LLC

State of Missouri
County of Chariton
Subscribed and sworn before me this 23 of December, 2018.


Notary Public

Notary Seal:



Attachment A

Air Link Rural Broadband L.L.C.'s
Missouri Articles of Organization

File Number:
LC1135194
Date Filed: 04/15/2011
Robin Carnahan
Secretary of State

ARTICLES OF ORGANIZATION
OF
AIR LINK RURAL BROADBAND, LLC

1. The name of the limited liability company is:

AIR LINK RURAL BROADBAND, LLC
(Must include "Limited Liability Company," "Limited Company," "LC," "L.C.," "L.L.C.," or "LLC")

2. The purposes of the limited liability company are as follows:

- (a) to engage or transact any lawful business for which a limited liability company may be organized under the Missouri Limited Liability Company Act; and
- (b) without limiting the generality of the foregoing, to provide wireless Internet services, equipment and support.

3. The name and address of the limited liability company's registered agent in the State of Missouri is:

Dale L. Linneman, 201 Cherry St., P.O. Box 31, Keytesville, MO 65261
Name Street Address: May not use P.O. Box unless street address also provided City/State/Zip

4. The management of the limited liability company is vested in one or more managers.
 Yes No

5. The events, if any, on which the limited liability company is to dissolve or the number of years the limited liability company is to continue, which may be any number or perpetual:

Perpetual
month/date/year

6. The name(s) and address(es) of each organizer:

<u>NAME</u>	<u>ADDRESS</u>
<u>Casey Imgarten</u>	<u>32898 Hwy 24, Salisbury, MO 65281</u>
<u>Vicki Imgarten</u>	<u>32898 Hwy 24, Salisbury, MO 65281</u>



7. For the tax purposes, is the limited liability company considered a corporation?
 Yes No

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: when filed
(Date may not be more than 90 days after the filing date in the office of Secretary of State)

In Affirmation thereof, the facts stated above are true:

Casey Ingarten Casey Ingarten April 13 2011
(Organizer Signature) (Printed Name) (Date)

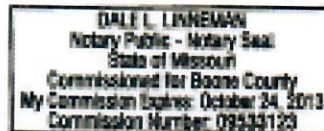
Vicki Ingarten Vicki Ingarten 4-13-2011
(Organizer Signature) (Printed Name) (Date)

STATE OF MISSOURI)
) SS
COUNTY OF BOONE)

I, DALE LINNEMAN, a notary public, do hereby certify that on the 13th day of APRIL, 2011, personally appeared before me Casey Ingarten and Vicki Ingarten, who, being by me first duly sworn, declared that they are the persons who signed the foregoing document as Organizers, and that the statements therein contained are true.

Dale Linneman
Notary Public

My Commission Expires: Oct. 24, 2013



State of Missouri



Robin Carnahan
Secretary of State

CERTIFICATE OF ORGANIZATION

WHEREAS,

AIR LINK RURAL BROADBAND, LLC
LC1135194

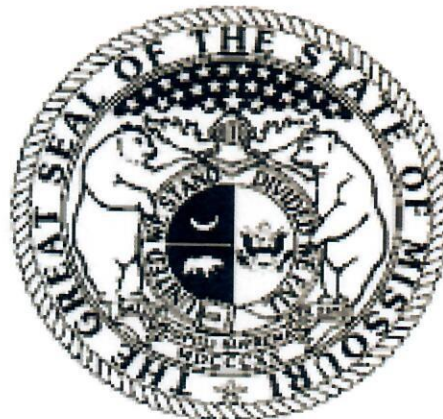
filed its Articles of Organization with this office on the 15th day of April, 2011, and that filing was found to conform to the Missouri Limited Liability Company Act.

NOW, THEREFORE, I, ROBIN CARNAHAN, Secretary of State of the State of Missouri, do by virtue of the authority vested in me by law, do certify and declare that on the 15th day of April, 2011, the above entity is a Limited Liability Company, organized in this state and entitled to any rights granted to Limited Liability Companies.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 15th day of April, 2011.

Robin Carnahan

Secretary of State



Attachment B

Air Link Rural Broadband, L.L.C.'s
Provisional Missouri Application for the Lifeline or
Disabled Program

Air Link Rural Broadband LLC Missouri Application for the Lifeline or Disabled Programs

Consumers meeting certain eligibility criteria are able to receive monthly discounts for voice telephony service through the Lifeline program or the Disabled program. Lifeline service offers a monthly discount of ~~\$8.50~~. The Disabled program offers a \$6.50 monthly discount. To apply complete this form and also submit proof of eligibility.

Eligibility Criteria	
Lifeline Program	Disabled Program
<input type="checkbox"/> MO HealthNet (f/k/a Medicaid)	<input type="checkbox"/> Veteran Administration Disability Benefits
<input type="checkbox"/> Supplemental Nutrition Assistance (Food Stamps)	<input type="checkbox"/> State Blind Pension
<input type="checkbox"/> Supplemental Security Income	<input type="checkbox"/> State Aid to Blind Persons
<input type="checkbox"/> Veterans and Survivors Pension Benefit	<input type="checkbox"/> State Supplemental Disability Assistance
<input type="checkbox"/> Federal Public Housing Assistance (Section 8)	<input type="checkbox"/> Federal Social Security Disability
<input type="checkbox"/> 135% of the Federal Poverty Level <i>(See next page for income threshold requirements)</i>	

Lifeline Program – Choose ONE service to apply the discount: *(check with provider for availability)*

- Telephone
 Broadband Internet Access Service ("BIAS")
 Service Bundle (Phone and BIAS)

Applicant's Full Name:	Birth Date:	Social Security # <i>(last 4 digits)</i> :	DCN: [*]
Name on Voice Service Account <i>(if different from Applicant)</i> :		Customer Contact Telephone Number:	
Customer's Full Residential Service Address <i>(no P.O. Boxes)</i> : Street: City, Town, Zip:		Is this address a temporary address? Yes / No <i>(circle the appropriate response)</i> <i>(If "yes" then must verify address every 90 days.)</i>	
		Is this address occupied by multiple households? Yes/No <i>(circle the appropriate response)</i> <i>(If "yes" or if Lifeline program records indicate another person at this address is already receiving a Lifeline Program benefit then you must complete the separate Lifeline Household Worksheet.)</i>	
Is this address also my billing address? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(if "no" please provide billing address):</i>			

^{*}This number is assigned to program participants of MO HealthNet and Food Stamps.

I understand the following obligations and provisions about the Lifeline and Disabled programs:

- The Lifeline and Disabled programs are government benefit programs and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline or Disabled service is available per household.
- A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline or Disabled benefits from multiple providers or combine Lifeline and Disabled program benefits.
- Violation of the one-per-household limitation constitutes a violation of rules and will result in the subscriber's de-enrollment from the program.

- Lifeline and the Disabled program are non-transferable benefits and the subscriber may not transfer his or her benefit to any other person.

I hereby certify under penalty of perjury that (please initial next to each statement):

- I meet the eligibility criteria for the Lifeline program or the Disabled program.
- I will provide notification to my voice service provider within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline or Disabled benefits including, as relevant, if I no longer meet the income-based or program-based criteria for receiving Lifeline or Disabled support, I receive more than one Lifeline or Disabled benefit, or another member of my household is receiving a Lifeline or Disabled benefit.
- If I move to a new address I will provide that new address to my voice service provider within 30 days.
- If I have a temporary residential address then I will be required to verify my address with my voice service provider every 90 days.
- My household will receive only one Lifeline or Disabled service and, to the best of my knowledge, my household is not already receiving a Lifeline or Disabled service.
- I acknowledge the obligation to re-certify my continued eligibility for Lifeline or Disabled benefits at any time and failure to re-certify my continued eligibility will result in de-enrollment and the termination of Lifeline or Disabled benefits.
- I consent to providing my name, telephone number and address to the Universal Service Administrative Company for the purpose of verifying I do not receive more than one Lifeline benefit. I also consent to sharing my account information with the Federal Communications Commission and Missouri Public Service Commission who oversee and administer the Lifeline or Disabled programs.
- I certify I have _____ individuals in my household.
(Detail and complete only if qualifying under income threshold.)

The information supplied on this form is true and correct.

I acknowledge providing false or fraudulent information to receive Lifeline or Disabled benefits is punishable by law.

Signature of Customer

Date

Submit a completed signed form and proof of eligibility.

Annual Income Thresholds for Meeting 135% of Federal Poverty Level (Based on Household Size)								
1	2	3	4	5	6	7	8	Each additional person
\$16,389	\$22,221	\$28,053	\$33,885	\$39,717	\$45,549	\$51,381	\$57,213	+ \$5,832/person

Acceptable documentation for meeting the criteria of 135% of the federal poverty level includes: a copy of prior year's state or federal tax return; paycheck stub (three consecutive months); a statement of benefits for Social Security, Veterans Administration, retirement/pension or Unemployment/Workmen's Compensation; or other legal documents showing current income (e.g. divorced decree, child support award). Any documentation must cover a full year or three consecutive months within the previous twelve months.

Company Use Only:

I hereby attest the applicant presented acceptable proof of eligibility:

Print name of company official

Signature

Date

[Air Link Rural Broadband logo, or contact information, here]

Attachment C

December 18, 2018 Email from
FCC Auction 903 Lead Team to
CAF Phase II Auction 903 Awardees

----- Forwarded message -----

From: **Auction903** <Auction903@fcc.gov>

Date: Tue, Dec 18, 2018 at 12:11 PM

Subject: ETC Lifeline Obligations for Auction 903 Recipients

To:

Hello,

Some Connect America Fund Phase II auction (Auction 930) long-form applicants have been obtaining their eligible telecommunications carrier (ETC) designations for the entire census block groups that are covered by their winning bids. A census block group that is covered by a winning bid may contain two types of census blocks: 1) census blocks where an Auction 903 recipient can use its Auction 903 support to offer the required service to locations in those census blocks (eligible census blocks), and 2) census blocks where an Auction 903 recipient cannot use its Auction 903 support to offer service to locations in those census blocks (ineligible census blocks). While a long-form applicant is not required to obtain an ETC designation that is limited only to the eligible census blocks covered by its winning bids, an Auction 903 recipient **may only use its Auction 903 support to offer the required voice and broadband services to locations in eligible census blocks.**

Moreover, an ETC designee commits to serving the **entire area** covered by an ETC designation and must offer Lifeline services throughout such area, in accordance with FCC rules and requirements. Accordingly, if you obtain an ETC designation that covers an entire census block group, you will have the obligation to provide Lifeline service **throughout** the census block group, even in ineligible census blocks.

Note that even if your ETC designation is limited to the eligible census blocks within the census block groups covered by your winning bids, you will have the obligation to provide Lifeline service throughout the eligible census blocks.

We remind all long-form applicants of your obligation to conduct due diligence regarding your obligations as an ETC. More information about the Lifeline program is available at: <https://www.fcc.gov/general/lifeline-program-low-income-consumers> and <https://www.usac.org/li/>.

If you have questions, please email Auction903@fcc.gov.

Thank you,

Lauren Garry, Katie King, and Heidi Lankau

Auction 903 Leads