

STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter of the application of)	
MEI Telecom, Inc.)	
for designation as an eligible)	Case No. U-20952
telecommunications Lifeline carrier)	
in the State of Michigan.)	
_____)	

**AMENDED APPLICATION OF MEI TELECOM, INC FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE STATE OF MICHIGAN**

I. INTRODUCTION

MEI Telecom, Inc. (“MEI”) pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”), Sections 54.01 through 52.207 of the Rules of the Federal Communications Commission (“FCC”), and the Rules and Regulations of the Michigan Public Service Commission (“Commission”), hereby submits this amended Application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Michigan. MEI seeks ETC designation to receive support from the Federal Universal Service Fund (“USF”), including funds under the FCC’s Rural Digital Opportunity Fund. MEI seeks to be designated as both a High-Cost Eligible Telecommunications Carrier and a Lifeline Eligible Telecommunications Carrier. As provided herein, MEI meets all the statutory and regulatory requirements for designation as an ETC in Michigan. Such a designation advances the public interest because it will enable MEI to provide Lifeline services to low-income Michigan residents and receive federal funding to build

critical telecommunications infrastructure in Michigan. For these reasons, MEI respectfully requests that the Commission approve this Application for ETC designation.

The contact information for MEI is:

David Stoll
MEI Telecom, Inc.
123 W. Orchard
Delton, MI 49046
269-623-9971
execadmin@mei.net

All correspondence, pleadings, notices, orders, and decisions concerning this application should be directed to MEI's counsel:

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Strategies Law Group, PLLC
1002 Parker Street
Falls, Church, VA 22046
bmcdermott@stratlg.com
571-730-4970

II. DESCRIPTION OF THE APPLICANT

MEI Telecom, Inc. was founded in 2013 and is incorporated under the laws of the State of Michigan. MEI has a permanent license to provide basic local exchange services in Michigan pursuant to Case No. U-17431. MEI currently provides data services to approximately 800 subscribers through its wireless network, as well as communications services to 214 voice and 61 business data customers through MEI's fiber network. MEI is headquartered at 123 W. Orchard Street, Box 127, Delton, Michigan 49046. MEI is a wholly owned subsidiary of Barry County Services Company ("BCSC"), a C-corporation incorporated under the laws of the State of Michigan in 1991. BCSC has approximately 250 shareholders, 30 employees, and a formally elected Board of Directors. MEI's sister corporation, Barry County Telephone Company ("BCTC") is a rural incumbent local exchange carrier ("ILEC") that was founded in 1917 and has been the provider of telephone and Internet services to Delton and surrounding communities including but not limited

to Barry Township, Dowling, Hope Township, Johnstown Township, Pine Lake, and Lake Doster Michigan. BCTC provides service to 13 community facilities and 10 anchor institutions including several Township fire departments, Township halls, schools, and libraries. BCTC currently holds ETC authority in Michigan. MEI is well qualified to be designated as an ETC. MEI holds core competencies in the design, deployment, and operation of high-capacity access solutions that provide private, residential and enterprise broadband services. MEI has operated as an Internet Service Provider ("ISP") since 1992. In 2014, MEI became certificated as a competitive local exchange carrier ("CLEC") in order to expand its service area to communities that were not well served by other providers. Since that time, MEI has proactively built fiber networks to serve Michigan communities and to provide economic opportunity through access to affordable and competitive broadband speeds. MEI's VoIP and POTS voice calls are provisioned and routed using Ribbon Communications C 15 communications switch. All SIP trunks terminate on a Ribbon Q 10 session boarder controller for security and session management before routing to the C 15 switch. See attached **Exhibit A**. Voice announcements, custom calling features, and voice mail are provided by Innovative Systems APMAX applications server. MEI has been able to connect businesses and residential communities with fiber optic and wireless technologies. Currently MEI provides an option for rural subscribers to access to a modern broadband Internet experience throughout Hastings, Gun Lake, Nashville, Oshtemo Township, Rutland Township, Shelbyville, Wayland Township, and Vermontville, Michigan. MEI provides services to 16 community facilities and 14 anchor institutions including but not limited to Barry County Sheriff, Barry County e911, The County of Barry (County seat offices), Hastings Public Library, Village of Nashville Municipal offices, Public Works, and Public Safety, Village of Vermontville Municipal offices and public works facilities, St. Rose of Lima School as well as providing service to many rural businesses. MEI has also recently been designated as a winning bidder by the Federal Communication Commission ("FCC") Office of Economics and Analytics and the Wireline Competition Bureau in the Rural

Digital Opportunity Fund ("RDOF") Phase 1 Reverse Auction (Auction 904) whereby the FCC is offering support for successful bidders to expand their networks to provide high speed fixed broadband service to rural homes and small businesses that lack it. MEI was assigned \$479,789.10 over a ten-year period to serve one hundred and seventy-five locations with Gigabit, low latency service. MEI Telecom is currently in compliance with the RDOF requirements and is meeting all fiber/broadband build-out deadlines. Attached as **Exhibit B** is a copy of the Census block identification numbers where the support was awarded and where MEI is required to seek a High Cost and Lifeline ETC designation ("RDOF Area") and the new requested areas.

MEI is also seeking High Cost and Lifeline ETC designation in an area where MEI has recently been awarded funding under the Department of Agriculture's Rural Utility Service Reconnect Program ("Reconnect Area").

MEI is led by a well-qualified management team that has many decades of experience developing, deploying, and operating telecom infrastructure. MEI is also financially well qualified to be designated as a High-Cost ETC and to provide Lifeline services pursuant to 47 C.F.R. § 54.202 (a)(4) as evidenced by the audited financial statements in our previous application.

III. MEI MEETS THE APPLICABLE REQUIREMENTS FOR ETC DESIGNATION

1. The Provision of Voice Grade Services

MEI acknowledges that, in accordance with the requirements of 47 C.F.R. § 54.101 (a) & (b), it will provide voice grade access to the public switched network or its functional equivalent. The voice grade service to be provided will utilize Voice over the Internet Protocol technology over its own fiber facilities in order to provision voice-equivalent service.

2. Local Usage

MEI will offer local usage plans with unlimited local service (with minutes of use for local service provided at no additional charge to end users). MEI will also offer broadband plans to meet the needs of customers that desire to purchase broadband only.

3. Toll Limitation Services

MEI will offer toll limitation services to qualifying low-income consumers.

4. Access to Emergency Services

MEI will provide access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems.

5. The Provision of Lifeline Services

MEI acknowledges that with Commission approval MEI will be eligible in all cases to claim reimbursement for Lifeline customers served and that, as a licensed basic local exchange carrier in the State of Michigan, MEI is required to offer the Lifeline discount to eligible customers regardless of federal reimbursement in compliance with Section 316 of the Michigan Telecommunications Act.

IV. ETC Qualifications

MEI provides the following information in response to the current Commission ETC Order for ETC applicants.

1. Certification Regarding Service Requirements.

Though this Application, MEI certifies that it will comply with the service requirements applicable to the support that it receives.

2. MEI will Advertise and Publicize the Availability of Lifeline Services.

MEI will broadly advertise the availability of Lifeline and its discounted rates to those that qualify in media of general distribution in compliance with 47 C.F.R. § 54.201(d)(2) and § 54.405(c). Attached as **Exhibit C** is a sample of the Lifeline advertising.

Information about MEI's Lifeline services, as well as all MEI's service offerings are available on MEI's website at <https://mei.net/lifeline/>. Information about the Lifeline application process is available at <https://mei.net/fine-print/>. A link to the Michigan Public Service Commission's Lifeline hotline will be posted on the company's website upon ETC Lifeline approval.

The combination of advertising and online information about Lifeline should be sufficient to reach those likely to qualify for Lifeline in compliance with 47 C.F.R. § 54.405(d).

3. Functionality in Emergency Situations.

MEI retains the ability to remain functional in emergency situations, including maintaining a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. MEI has significant experience with emergency preparedness and is well prepared to respond to emergency situations. MEI has appropriate Disaster Recovery Plans in place to respond to emergency situations. MEI's fixed wireless network has reasonable amounts of back-up power and the ability to reroute traffic around damaged facilities and manage traffic spikes resulting from emergency situations. MEI's fiber optic network is supported by uninterruptible power supply facilities including 8 hours of battery backup. Fixed standby generators along with portable generators are used to maintain network and service up time for extended commercial power outage situations. MEI utilize numerous monitoring and management tools to respond to any service outages and to pro-actively anticipate any bottlenecks or developing network issues.

MEI intends to continually upgrade its capabilities (tools and training) to troubleshoot the network, to the subscribers and upstream.

4. Consumer Protection and Service Quality Standards.

MEI will satisfy applicable consumer protection and service quality standards, including complying with 47 C.F.R. § 54.202 (g) and all applicable state and consumer protection and service quality standards. As an operating CLEC in Michigan, MEI already is subject to Michigan's consumer protection and service quality requirements and MEI's customers will receive the service quality and consumer benefits of those protections. MEI will be responsible, managerially, and legally, for handling and responding to any customer issue.

MEI follows all applicable federal and state monitoring and reporting service quality metrics. MEI has implemented consumer protection measures to protect private customer information including the adoption and implementation of a Customer Proprietary Network Information ("CPNI") Policy that is consistent with federal regulations. MEI has also made all required annual CPNI certifications. MEI's customer service number is (269) 623-9005 which is available for complaints and service issues. That number is available on MEI's website at: <https://mei.net/customer-support/>.

To the extent that customers receive wireless services, those services will be fixed wireless services, not mobile wireless. Therefore, some of the provisions of the Cellular Telecommunications and Internet Association's ("CTIA") Consumer Code for Wireless Services ("CTIA Code") are not applicable to MEI. MEI will comply with those portions of the CTIA Code which are applicable to fixed wireless services.

5. Tribal Lands.

MEI is not seeking designation as an ETC Lifeline for any part of Tribal Lands. MEI's service area does not include any tribal lands.

V. Conclusion

Applicant submits that the information contained herein demonstrates that MEI meets the requirements for a Lifeline ETC designation in the selected areas and the expansion of MEI's broadband service offering in the state of Michigan will serve the public interest.

WHEREFORE, MEI respectfully requests that the Commission promptly grant this Application as soon as possible.

Respectfully submitted,

David Stoll

MEI Telecom, Inc.

123 W. Orchard

Delton, Michigan 49046

dstoll@mei.net

269-623-9971

Dated November 30, 2022

STATE OF MICHIGAN

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COUNTY OF BARRY

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VERIFICATION

I, David Stoll, am the General Manager and CEO of MEI Telecom, Inc. (the "Company"), that I am authorized to make this Verification on behalf of the Company, that the foregoing Application was prepared under my direction and supervision; and that I certify or declare under penalty of perjury under the laws of the State of Michigan that the foregoing is true and correct to the best of my knowledge, information, and belief.

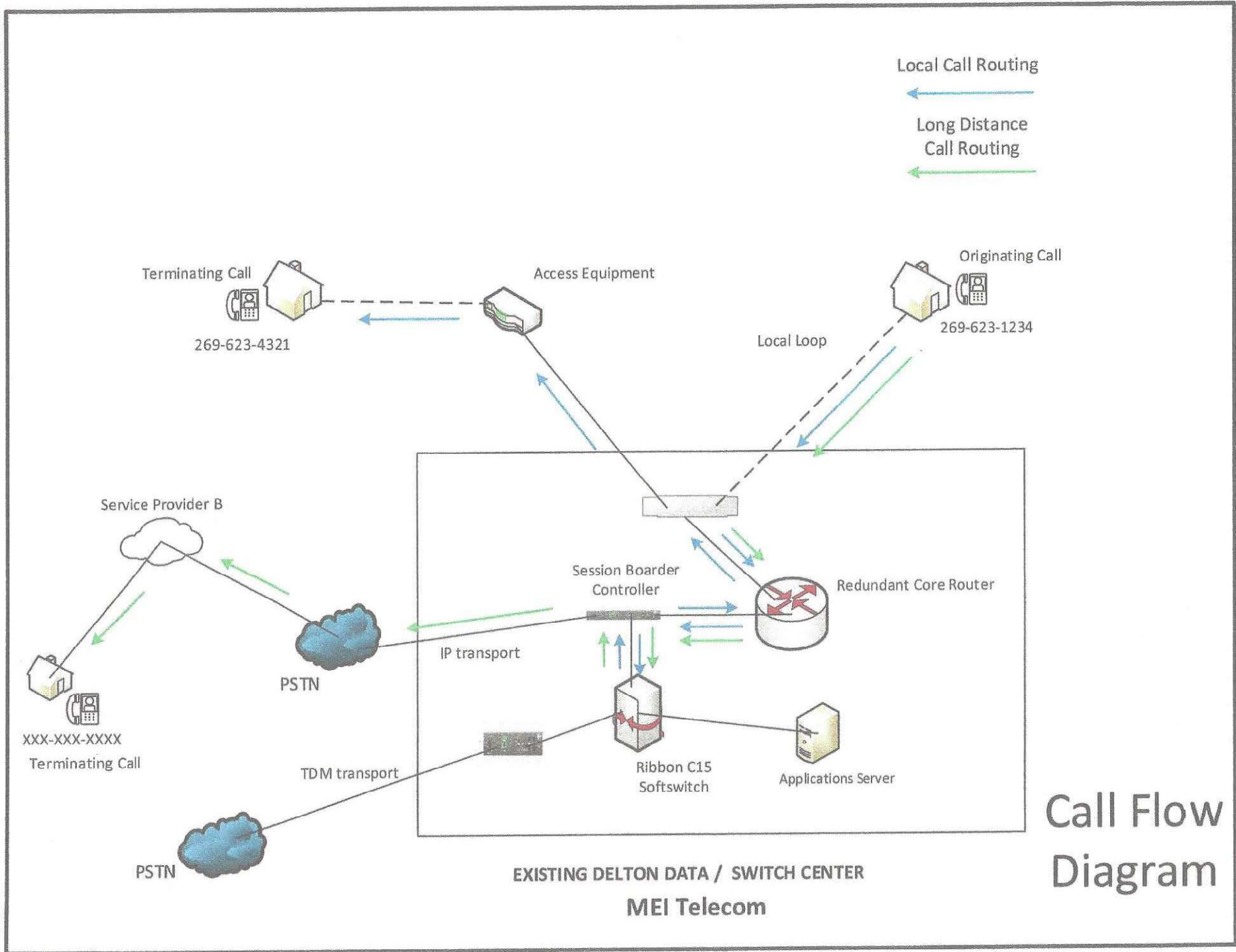
MEI commits to provide the services and functionalities required for designation as a High-Cost and Lifeline ETC in the areas described in the Application. MEI will use any federal High-Cost support funds that it receives to only provide, construct, upgrade and maintain the facilities and services for which the support is intended. Lifeline support funds will be used to apply the benefit to those qualified subscribers.

David Stoll, General Manager & CEO

Sworn and subscribed before me this 30 day of November 2022.

Exhibit A

Call Flow Diagram



Call Flow Diagram

Exhibit B

**Current Areas and New Requested
Areas**

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New Requested Area

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Exhibit C

Sample Lifeline Advertising



Lifeline

What is Lifeline?

Lifeline is a federal program that lowers the monthly cost of phone and Internet for qualifying customers.

You can get one Lifeline discount (phone or Internet, but not both) per household, not per person, and a household can get a Lifeline discount from only one provider.

Do I qualify?

You may qualify for a Lifeline discount based on:

1. Your income - You may be eligible for a Lifeline discount if your income is 135% or less than the federal poverty guidelines.

- OR -

2. Participation by you or someone else in your household in one of the following federal assistance programs:

- Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps
- Medicaid
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (FPHA)
- Veterans Pension and Survivors Benefit
- Tribal Programs (and live on federally-recognized Tribal lands)

Qualifying customers will need to recertify every year to maintain their Lifeline discount. You'll need to do this within 60 days of notification, or you'll lose your Lifeline discount.

How do I apply?

Please apply online via the National Verifier website:

www.lifelinesupport.org/national-verifier

You can also download and print a copy of the application or request one from our office.

Once you have applied and been approved by the National Verifier eligible customers will receive a discount applied to their bill.

Barry County Telephone Company & MEI Telecom, Inc.

107 North Grove • Delton, MI 49046-0127

Customer Service 269-623-2311 • Fax 269-623-8033