

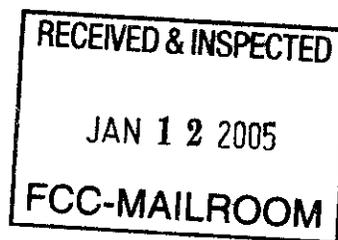
Mississippi Public Service Commission



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DOCKET FILE COPY ORIGINAL
DAVID L. CAMPBELL
SENIOR ATTORNEY



January 6, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
9300 East Hampton Dr.
Capitol Heights, MD 20743

Re: CC Docket No. 96-45, No. 00-256; January 1st Certification Requirement for Rural Carriers

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 54.314, the Mississippi Public Service Commission ("MPSC") files its required certification for the Second Quarter of 2005 for the rural areas of Centennial Cellular Tri-State Operating Partnership (Study Area Code - 289005) and Centennial Claiborne Cellular Corp. (Study Area Code -- 289004).

In accordance with the Federal Communication Commission's ("FCC") requirements in *Federal/State Joint Board on Universal Service, Fourteenth Report and Order, Twenty-Second Order on Reconsideration, and Further Notice of Proposed Rulemaking in CC Docket No. 96-45 and Report and Order in CC Docket No. 00-256*, the Mississippi Public Service Commission hereby certifies that all federal high cost support (which includes high cost loop support, local switching support, high cost support received pursuant to the purchase of exchanges, high cost model support, and hold harmless support) provided to Centennial Cellular Tri-State Operating Partnership and Centennial Claiborne Cellular Corp. will be used only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, consistent with Section 254(e) of the Telecommunications Act of 1996.

Attached are copies of the Commission's orders in Docket No. 03-UA-234.

Enclosed is a stamped addressed envelope and an additional copy of this letter for you to use in forwarding a stamped filed copy of this correspondence. Thank you for your assistance in this matter.

In accordance with the FCC's mandate, a certification letter is also being sent to Irene Flannery, Universal Service Administrative Company.

Sincerely,

Handwritten signature of Bo Robinson in cursive.
Bo Robinson, Chairman

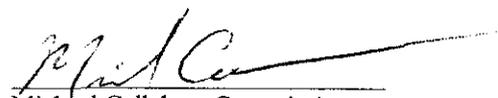
Handwritten signature of Nielsen Cochran in cursive.
Nielsen Cochran, Vice-Chairman

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Marlene H. Dortch

January 6, 2005

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A handwritten signature in black ink, appearing to read "Michael Callahan", written over a horizontal line.

Michael Callahan, Commissioner

Enclosure

cc: Bruce McKinley

Bobby Waites

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

2003-UA-0234

**IN RE: APPLICATION OF CENTENNIAL
CELLULAR TRI-STATE OPER-
ATING PARTNERSHIP and
CENTENNIAL CLAIBORNE CELL-
ULAR CORP. FOR DESIGNATION
AS AN ELIGIBLE TELECOMMUNI-
CATIONS CARRIER PURSUANT
TO SECTION 214(e)(6) OF THE
TELECOMMUNICATIONS ACT OF
1937**

ORDER

Upon rehearing, there came on for consideration this day the application of Centennial Cellular Tri-State Operating Partnership and Centennial Claiborne Cellular Corporation ("Centennial") for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214 (e)(6) of the Telecommunications Act of 1934, as amended ("the Act"). The Commission, being sufficiently advised and with the concurrence of the Public Utilities Staff, finds as follows:

- (1) The Commission has jurisdiction over the subject matter and the parties to enter this Order and entry hereof is in the public interest.
- (2) On April 16, 2003, Centennial filed with this Commission its application for designation as an ETC for purposes of receiving Universal Service Funds ("USF") pursuant to Section 214 (e) of the Act and Federal Communications Commission ("FCC") Rules 47 C.F.R. §§ 54.201 through 54.207 in its FCC-licensed service areas in the State of Mississippi.
- (3) Due and proper notice of the Application was given to all interested persons as required by law and the Commission's Public Utilities Rules of Practice and Procedure.

(4) BellSouth Telecommunications, Inc., ("BellSouth") and the Mississippi Rural Independent Telephone Companies ("Rural Independents") intervened and became parties of record in this matter.

(5) Centennial provides wireless telecommunications service in designated areas of the State of Mississippi. These areas are comprised of fourteen counties divided into two areas, Rural Study Area 8 ("RSA8") and Rural Study Area 9 ("RSA9"). These areas are served by rural providers Alltel of Mississippi, Inc., ("Alltel") Franklin Telephone Company, Inc., ("Franklin") and Georgetown Telephone Company, Inc. ("Georgetown").

(6) Centennial sought and was granted bifurcation of proceedings for consideration separately of the Application in those areas served by BellSouth from those served by the Rural Independents. The ETC designation in BellSouth service areas was granted on September 24, 2003.

(7) An Order granting ETC status to Centennial in the rural portions of its service area was granted April 7, 2004. An Amended Order for clarification was issued April 22, 2004. The Rural Independents filed a Motion for Rehearing on April 30, 2004. This motion was granted on May 20, 2004.

(8) A hearing was had on the matter on June 30, 2004, before the full Commission.

PURPOSES OF THE ACT

(9) The Telecommunications Act of 1934 has as its purpose the goal of making available to all Americans rapid and efficient radio and wire communication service.¹ Rural consumers are a specifically designated concern of the Act, in recognition of the reality that providing service in low population density areas is an expensive proposition to a provider with very little, if any,

¹ 47 U.S.C. § 151.

profit margin. Congress explicitly stated rural, insular and high cost areas should have access to reasonably comparable services as those available in more profitable urban areas.²

(10) The 1996 amendments to the Act were intended to fully open the telecommunications market to competition. Specifically, “to provide for a pro-competitive, de-regulatory national policy framework designated to accelerate rapidly the private sector deployment of advanced telecommunications and information technologies and services to all Americans by opening all telecommunications markets to competition”³ The Universal Service Fund was created as an explicit subsidy to assist in defraying the costs associated with achieving the Act’s goals.⁴

(11) The focus of the Act is on consumers, not companies. Rural telephone companies have not been granted protection from competitive forces, but Congress did recognize the unique position of rural carriers and consumers. In particular, Congress was concerned about the continuation of adequate service to rural consumers in the event a rural incumbent elected to relinquish its ETC designation.⁵ To that end, upon consideration of an ETC petition in rural areas, it is not sufficient that a telecommunications carrier is able to provide the necessary services. The Commission must also be persuaded that such a designation serves the public interest.⁶

(12) The importance of the public interest analysis has drawn much attention lately as part of a larger debate. The exponential growth of the USF in recent years has drawn the future sustainability of the Fund into question. The FCC has received recommendations from the Federal-State Joint Board on Universal Service and intends to make certain changes in the

² 47 U.S.C. § 254(1)(b).

³ *Joint Explanatory Statement of the Committee of the Conference*, H.R. Conf. Rep. No. 458, 104th Cong., 2d Sess. At 131.

⁴ 47 U.S.C. § 254(e).

⁵ *FCC Memorandum Opinion and Order in Re: Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, CC Docket No. 96-45 (¶ 18)(December 26, 2000).

⁶ 47 U.S.C. § 214(e)(2).

applicable rules. In the interim, recent decisions of the FCC on ETC designation petitions have encouraged state Commissions to conduct thorough, fact-intensive reviews of ETC petitions for rural areas.⁷

(13) This Commission has never before defined the factors which constitute the public interest analysis in this context. We take this opportunity to announce the following policy considerations to be applied to applications for ETC designations in rural areas:

- (1) Benefits of increased competition.
- (2) Impact of designation upon the Universal Service Fund.
- (3) Commitment to quality of service by the competitive provider and ability to provide the supported services in a timely manner.
- (4) Unique advantages and disadvantages of a competitor's service offering.
- (5) Cream skimming analysis.

(14) In order to effectuate the above policy considerations, we also announce certain requirements to which a carrier must commit before ETC status in rural areas will be granted. These requirements are discussed in the relevant sections to follow.

(15) The public interest analysis and requirements we adopt with this Order shall be applicable to all future applications for designation as an eligible telecommunications carrier by any competitive provider.

1. Benefits of increased competition

(16) The public benefits of competition are well-known. A competitive marketplace encourages innovation in products and services, produces incentives for efficiencies and increases the service options available to consumers. Competition alone is not sufficient to justify the granting of an ETC designation. It is, however, the articulated purpose of the 1996 amendments to the Act and is thus an important consideration. It is particularly important in the rural setting where the cost of deploying new services is high. Cellular service, while ubiquitous

⁷ FCC Memorandum Opinion and Order in Re: *Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45 (¶ 28)(December 31, 2003).

in urban areas, is less competitive in rural ones and the distance between cellular towers makes service less predictable. Providing funds for cellular services to build and maintain the necessary infrastructure to serve rural areas meets the dual goals of the Act in providing rural Americans with comparable services and encouraging a pro-competitive environment.

(17) Centennial currently provides cellular service in RSAs 8 and 9. With ETC designation, Centennial would be able to expand its coverage area, increase the quality of service available to its customers and make available to rural consumers comparable technology as is available in urban locations. Designation of Centennial as an ETC under this consideration is therefore in the public interest.

2. Impact of designation on the Universal Service Fund

(18) In recent months, a great deal of concern has been expressed regarding the sustainability of the USF due to the tremendous increase in the number of ETC designations granted.⁸ A number of suggestions have been made which, if adopted by the FCC, would directly impact future ETC designations by this Commission.

(19) The importance of sustaining the USF cannot be overstated. At present, however, there is no meaningful measurement of any given designation upon the USF. While one may reach a mathematical calculation which states what percentage of the USF as a whole a company receives, as a practical matter in state proceedings, that number will almost always be insignificantly small. The concern is not how much of the Fund an individual provider would receive but the effect of many companies upon the Fund.⁹ While each provider only receives a small amount in comparison to the total Fund, the aggregate directly affects future Fund

⁸ See, e.g., *In re Federal-State Joint Board on Universal Service Recommended Decision*, CC Docket No. 96-45 (February 27, 2004).

⁹ *FCC Memorandum Opinion and Order in Re: Virginia Cellular, LLC, Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, ¶ 31.

viability. Thus, a statement that Centennial would receive only a tiny portion of the USF budget is meaningless and, to a degree, misleading as it does not address the actual perils facing the Fund.

(20) We acknowledge that granting an ETC designation to any company will impact the USF. In this instance, however, that alone is insufficient to deny Centennial's ETC petition. At present, no cellular companies have been granted a rural ETC designation in the State of Mississippi which creates a disadvantage to the rural residents of this state and frustrates the dual purposes of the Act. Designation of Centennial as an ETC under this consideration is therefore in the public interest. As the FCC offers guidance in the future on this matter, we will accordingly amend the manner in which we review this particular concern.

3. Commitment to quality of service by the competitive provider and the ability to provide the supported services in a timely fashion

(21) The concern of the Commission under this consideration is to ensure rural consumers receive high quality, reliable service, particularly in the event a rural incumbent relinquishes its own ETC designation. In addition, the ability to provide quality service furthers the goal of making available to rural consumers technology comparable to that of urban locations.

(22) Before a provider may be granted ETC status, it must establish it is able to provide certain services:

- a. Voice grade access to the public switched network;
- b. Access to free-of-charge "local usage" defined as an amount of minutes of use of exchange service;
- c. Dual-tone multi-frequency signaling or its functional equivalent;
- d. Single-party service or its functional equivalent;
- e. Access to emergency services;
- f. Access to operator services;
- g. Access to directory assistance;
- h. Access to interexchange services;

- i. Toll limitations services for qualifying low-income customers.¹⁰

(23) In addition to these basic service requirements, the Commission prescribes the following requirements in order to assure quality, quantity and timeliness of service:

- a. Mandatory compliance with the CTIA Consumer Code for Wireless Service;
- b. Submission to the Commission the number of consumer complaints per 1000 handsets on a quarterly basis;
- c. Designation of a representative for addressing customer service or quality of service complaints received by the Commission. The company representative should have the authority to resolve all complaint issues.
- d. In providing supported services, the competitive provider shall provide immediate service to prospective customers within its existing network. When the prospective customer lies within the carrier's service area but outside of its existing network coverage, the ETC shall take the following steps in descending order:
 - 1. Determine whether the requesting customer's equipment can be modified or replaced to provide service;
 - 2. Determine whether a roof-mounted antenna or other equipment can be deployed to provide service;
 - 3. Determine whether adjustments can be made at the nearest cell tower to provide service;
 - 4. Determine whether a cell-extender or repeater can be employed to provide service;
 - 5. Determine whether there are any other adjustments to network or customer facilities that can be made to provide service;
 - 6. Determine whether it can offer resold services from another carrier's facilities to provide service;
 - 7. Determine whether an additional cell site can be constructed to provide service and evaluate the costs and benefits of using high-cost support to serve the number of customers requesting service through such additional cell sites. If there is no possibility of providing service short of construction of a new cell site, the ETC will report this fact to the Commission along with the projected costs of construction and the ETC's determination as to whether the request for service is reasonable and whether high-cost funds should be expended on the request.
 - 8. Steps 1-6 of this procedure must be completed by the provider within thirty days of receiving a request for service. Should the provider find it necessary to proceed to Step 7, the provider will promptly notify the Commission and complete the analysis within an additional fifteen days.

¹⁰ 47 U.S.C. § 214(e) and C.F.R. § 54.201.

(24) Financial stability of a company is also an inherent requirement of determining that company's ability to provide service. In addition to the disclosures submitted with an initial filing of an application, a competitive ETC shall file annual reports with the Commission as required under Rule 3(F) of the Commission Rules and Regulations Governing Public Utility Service.

(25) All of these requirements shall be mandatory for all rural ETCs in the State of Mississippi. Failure to agree to them will result in the denial of an ETC designation petition regardless of any other considerations. Failure to abide by them after designation will result in an immediate inquiry into whether or not a designation should be suspended or withdrawn.

(26) Centennial has previously established its financial health in the initial review of its petition. A number of the non-financial requirements have already been assumed voluntarily by Centennial, such as compliance with the CTIA Consumer Code of Wireless Service. Centennial has also agreed to abide by some of the reporting obligations of this section. However, Centennial has not agreed to make all of these requirements binding prerequisites to the grant of their application. Such agreement shall be obligatory before the remainder of this Order may be effectuated but otherwise we find designation of Centennial as an ETC under this consideration is in the public interest.

4. Unique advantages or disadvantages of a competitor's service offering

(27) Wireline and wireless services each have their own advantages and disadvantages. With wireless service the greatest and most obvious advantage is mobility. "The mobility of telecommunications assists customers in rural areas who often must drive significant distances to

places of employment, stores, schools, and other critical community locations.”¹¹ It is also invaluable in summoning emergency services in rural areas where public access telephones are few and far between. Wireless networks also tend to have broader local calling areas than wireline providers which assists in “leveling the field” between rural and urban areas and provides a direct benefit to the individual consumer.

(28) The disadvantages of wireless include the common requirement by providers that a customer agree to a service contract, often for multiple years. The rural ILECs have no such binding service requirements.

(29) This Commission also has no authority to regulate the rates of wireless providers.¹² The incumbent carriers’ rates are regulated and these companies must seek approval by this Commission before amending them. A wireless provider may alter its rates with no explanation or regulatory oversight. While this is certainly a competitive advantage in the marketplace, it raises for this Commission the concern of predatory pricing behavior. This will be of even greater concern in the future if the FCC adopts the recommendation to limit support to a single, primary line per household.¹³ In the far more fiercely competitive atmosphere for Universal Service dollars such a decision would create, predatory pricing is not an insignificant possibility.

(30) At the present time, the advantages of deploying wireless service on the broadest possible scale outweigh the disadvantages, as well as furthering the goals of the Act. However, in order to assure that the competitive goals of the Act are met but not abused, we shall require wireless ETCs to make all service offerings available on their respective internet web sites, make available to the Commission all documentation to support the retail rates offered in areas in

¹¹ *Virginia Cellular Memorandum Opinion and Order* (¶ 29).

¹² 47 U.S.C. § 332(c)(3).

¹³ *In re Federal-State Joint Board on Universal Service Recommended Decision*, CC Docket No. 96-45, ¶ 3.

which the carrier receives federal universal service funds, and to file and update Lifeline/Linkup tariffs for Commission approval.

(31) Centennial must agree to these requirements before the remainder of this Order will be effectuated but otherwise we find designation of Centennial as an ETC under this consideration is in the public interest.

5. Cream skimming analysis

(32) Another concern of designating competitive ETCs is that a competitor shall solicit and serve only in the high density, low cost areas of a rural telephone company's study area.¹⁴

Mississippi is an overwhelmingly rural state. According to the 2000 Federal Census, only three Mississippi cities are classified as non-rural in this context, having populations of 50,000 or more residents.¹⁵ As a practical reality, there are no high density, low cost areas by traditional definition outside of these three population centers, none of which are located within RSAs 8 and 9 and thus there is no cream to skim.

(33) However, there are areas of higher population concentrations than others even within an officially rural area. We must closely review applications which seek to serve only in those RSAs of *higher* population where a rural telephone company maintains several wire centers in different RSAs. We must also be concerned about competitive wireless providers who only advertise and make available its services in the most heavily populated portions of a rural incumbent's study area despite licensure to serve an entire study area.

¹⁴ *Virginia Cellular Memorandum Opinion and Order* (¶ 32).

¹⁵ Biloxi-50,644
Gulfport-71,127
Jackson-184,256.

(34) The FCC has made our analysis infinitely more manageable by their method of issuing cellular service licenses with clearly defined geographical boundaries. These boundaries are static and apply to all providers licensed in a particular market or rural area.

(35) All competitive ETCs shall be required to advertise and make service available throughout the entirety of their FCC-licensed area. Failure to do so is more often than not an after-the-fact discovery rather than a problem which may be avoided in advance. However, in order to avoid noncompliance as much as is feasible, we shall also require the following reporting obligations of rural competitive ETCs:

1. Submission of quarterly reports detailing the number of service requests in the licensed area which go unfulfilled and the basis for the refusal of service.
2. Submission of an initial build-out plan for areas where facilities do not yet exist upon designation as an eligible carrier.
3. Submission of maps showing existing facilities, coverage area, and planned sites of new facilities upon designation as an eligible carrier and updated annually.
4. Submission of a yearly Universal Service Plan on June 1st of each year for the Commission's use in complying with the October 1st certification deadline set forth by the FCC. The plan shall include the amount of universal service funds the company expects to receive the following year and the company's proposed use of those funds.
5. The company shall file quarterly reports of the amount of universal funds received for the quarter and updates of the progress of the projects previously approved by the Commission.

(36) Once again, Centennial has previously agreed to assume some of these reporting obligations but not all. Agreement with all requirements is necessary before the remainder of this Order will become effective.

(37) Upon consideration of all available facts and policy considerations, we find designation of Centennial as an ETC in Mississippi RSAs 8 and 9 consistent with the public interest.

(38) The study area of Georgetown Telephone Company is wholly encompassed within RSA 9. Alltel of Mississippi, Inc., a disaggregated carrier, serves areas both within and without RSA

9, including a wire center located in Florence, Mississippi. Although the bulk of Alltel's Florence wire center is located outside of RSA 9, a small portion does cross into that study area. Consistent with FCC precedent, Centennial Cellular is not granted ETC designation for the Florence wire center, only for Alltel's Bassfield and Prentiss wire centers, both of which are located entirely within RSA 9. Franklin Telephone Company serves areas in both RSA 8 and 9, as well as areas in southeast Mississippi and northeast Mississippi, areas outside the scope of Centennial's FCC licensed area. Centennial is not legally authorized to render service in the portions of Franklin's study area located outside of RSAs 8 and 9. For this reason, the study area of Franklin Telephone Company, Inc., is subject to redefinition with FCC approval pursuant to 47 C.F.R. § 54.207.

IT IS, THEREFORE, ORDERED:

- (1) The Application of Centennial Cellular Tri-State Operating Partnership and Centennial Claiborne Cellular Corporation for designation as an eligible telecommunications carrier in the State of Mississippi in Rural Study Areas 8 and 9 for which it holds valid licensure issued by the Federal Communications Commission is GRANTED. Centennial shall provide service either through its own facilities or through its own facilities in combination with resale to all subscribers upon request in its designated area.
- (2) This Order is conditioned upon Centennial's formal, written acceptance of the requirements herein detailed.
- (3) This Order is conditioned upon acceptance by the Federal Communications Commission of a Petition to Redefine the Study Area of Franklin Telephone Company, Inc.
- (4) This designation is for federal universal service funds, and is based on federal rules and guidelines as they presently exist. This Commission retains continuing jurisdiction to review,

modify or revoke its designation. Additionally, should any substantive information in this docket supplied by Centennial prove inaccurate, the designation of Centennial as an ETC is subject to revocation.

(5) The entire file of the Commission and all responses to all discovery requests of the Mississippi Public Utilities Staff are specially made part of the record in this matter. All information or documents submitted to the Commission as proprietary or confidential shall remain under seal.

SO ORDERED, this the 10th day of August, 2004.

Chairman Bo Robinson voted Aye, Vice Chairman Nielsen Cochran voted Aye
Commissioner Michael Callahan voted Aye.



MISSISSIPPI PUBLIC SERVICE COMMISSION

Bo Robinson
BO ROBINSON, Chairman

Nielsen Cochran
NIELSEN COCHRAN, Vice-Chairman

Michael Callahan
MICHAEL CALLAHAN, Commissioner

ATTEST: A TRUE COPY

Brian U. Ray
BRIAN U. RAY, Executive Secretary

**BEFORE THE
MISSISSIPPI PUBLIC SERVICE COMMISSION**

03-UA-234

**IN RE: APPLICATION OF
CENTENNIAL CELLULAR TRI-
STATE OPERATING PARTNERSHIP
AND CENTENNIAL CLAIBORNE
CELLULAR CORPORATION FOR
DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER
UNDER 47 U.S.C. 214(e)(2)**

ORDER

HAVING COME ON BEFORE the Mississippi Public Service Commission (“Commission”) for the consideration of the Centennial 2005 Utilization Plan Mississippi Non-Franklin Rural Markets (Revised) (“Revised Plan”) heretofore submitted to this Commission by Centennial Cellular Tri-State Operating Partnership and Centennial Claiborne Cellular Corporation (“Centennial”), and after reviewing the Revised Plan and being otherwise sufficiently advised, this Commission finds as follows:

I.

On April 4, 2003, Centennial filed its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) under Section 47 U.S.C. § 214(e)(2). On August 10, 2004, Centennial was designated by the Commission as an ETC in the rural portions of its service area except that the granting of ETC status for the areas served by Franklin Telephone Company, Inc. (“Franklin”) is conditioned upon acceptance by the Federal Communications Commission (“FCC”) of a petition to redefine Franklin’s study area.

II.

On December 17, 2004, Centennial submitted a plan for utilization of the Federal Universal Service Fund support for the year 2005 for approval by the Commission (this

plan reflected universal service funds for the portions of Centennial's rural service area that are not served by Franklin). On December 22, 2004, it submitted its Revised Plan, again reflecting usage of the funds granted for the non-Franklin portions of Centennial's rural service area. As such, this plan only reflects funds for the two Centennial cell sites within its Mississippi rural service area that are not located within Franklin's service area: the Prentiss and Georgetown cell sites.

III.

The Commission, after consultation with the Public Utilities Staff, concludes that Centennial's Revised Plan is consistent with the Telecommunications Act of 1996 and the pertinent FCC orders.

IT IS, THEREFORE, ORDERED:

1. The Commission hereby certifies that the Centennial 2005 Utilization Plan Mississippi Non-Franklin Rural Markets (Revised) is consistent with 47 U.S.C. § 254(e).
2. Centennial shall file quarterly reports with the Commission providing the status of universal service fund expenditures and projects, and
3. This Order is effective as of the date hereof.

SO ORDERED, this the 6th day of JANUARY, 2005.

Chairman Bo Robinson voted Aye, Vice Chairman Nielsen Cochran voted Aye, and Commissioner Michael Callahan voted Aye.

MISSISSIPPI PUBLIC SERVICE COMMISSION

BY:

Bo Robinson
BO ROBINSON, CHAIRMAN

BY: *Niel Cochran*
NIELSEN COCHRAN, VICE CHAIRMAN

BY: *Michael Callahan*
MICHAEL CALLAHAN, COMMISSIONER

ATTEST: A TRUE COPY

Brian U. Ray
BRIAN U. RAY
EXECUTIVE SECRETARY

