



Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law

March 8, 2011

Via email and certified mail

Leo Bub
Counsel
AT&T Missouri
One Bell Center, Room 3520
St. Louis, MO 63101

Re: Request for Blocking of Traffic of Halo Wireless Inc. terminating to Northeast Missouri Rural Telephone Company, made pursuant to the Missouri Enhanced Record Exchange Rule of the Missouri Public Service Commission.

Dear Mr. Bub:

This is a traffic blocking request made pursuant to 4 CSR 240-29.130. The terminating carrier making this request is Northeast Missouri Rural Telephone Company (Northeast). The originating carrier whose traffic Northeast is requesting ATTMo to block is that of Halo Wireless Inc., OCN 429F (HW).

Northeast billed HW on February 1, 2011. HW refused to honor the invoice by letter dated February 21, 2011, saying it had no obligation to pay. This response is similar to that which is the subject of other recent blocking requests for HW traffic. In addition to this failure to compensate Northeast, based on Northeast switch records it appears that some of the traffic is wireline originated, some is interLATA wireline traffic, and HW has not delivered correct originating caller identification information to Northeast.

Northeast requests that ATTMo block HW traffic from terminating over the LEC-to-LEC network to the following Northeast exchanges:

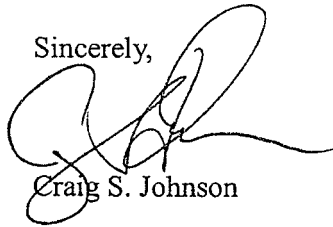
<u>Exchange</u>	<u>NPA-NXX</u>	<u>Exchange</u>	<u>NPA-NXX</u>
Arbela	660-945	Novinger	660-488
Brock	660-328	Omaha	660-933
Green City	660-874	Pollock	660-692
Lemons	660-344	Queen City	660-766
Luray	660-866	Tobin Creek	660-883
Martinstown	660-355	Unionville	660-947
Memphis	660-465	Winigan	660-857

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573-659-8734 • 573-761-3587 FAX

Northeast requests that this traffic be blocked on April 11, 2011, or another date mutually agreeable to Northeast and ATTMo that is within 45 days of this request. 4 CSR 240-29.130(6).

Please let me know as soon as you can.

Sincerely,

A handwritten signature in black ink, appearing to be 'CSJ', written over the printed name 'Craig S. Johnson'.

cc: Gary Godfrey
Janice Williams
John Van Eschen
Bill Voight
Todd Wallace, CTO, Halo Wireless
John Marks, General Counsel, Halo Wireless

EXHIBIT 26
3/8/2011 LETTER FROM CRAIG S. JOHNSON



Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law

March 8, 2011

Via email and certified mail

Todd Wallace, CTO
Halo Wireless Inc
3437 W. 7th St
Box 127
Fort Worth, TX 76107

Re: Notice of Request for Blocking of Traffic of Halo Wireless Inc. terminating to Northeast Missouri Rural Telephone Company, made pursuant to the Missouri Enhanced Record Exchange Rule of the Missouri Public Service Commission.

Dear Mr. Wallace:

Please be notified that Northeast Missouri Rural Telephone Company (Northeast) has requested that AT&TMO block Halo Wireless Traffic terminating to Northeast pursuant to Missouri Public Service Commission Rule 4 CSR 240-29.130. A copy of that request is attached hereto for your reference.

Pursuant to the Commission Rule, Halo Wireless is notified of the reasons for, date of, and actions it can take to avoid, this traffic blocking.

Reasons for Blocking Request

Halo Wireless has refused to pay compensation for the traffic AT&TMO identified Halo Wireless as being the originating carrier for, stating it had no obligation to pay Northeast's invoice therefore; it appears some HW traffic transited by AT&TMO to Northeast is interLATA wireline traffic; it appears some HW traffic transited by AT&TMO to Northeast may not have been originated by HW; and it appears HW may not have delivered correct originating caller identification to Northeast for such traffic.

Date Traffic is Requested to be Blocked

April 11, 2011.

Actions Halo Wireless Can Take to Prevent Blocking

Halo Wireless can take any of the following actions to prevent implementation of this blocking request:

- a. agree to enter into good faith negotiations to adopt or establish an interconnection agreement with Northeast; or

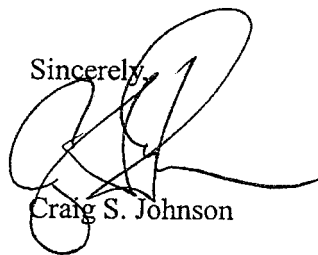
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- b. placing a sufficient amount of monies into escrow for Northeast to recover its intrastate intraLATA access charges on all HW intrastate intraLATA traffic transited by ATTMo for termination to Northeast coupled with filing a formal complaint with the Missouri Public Service Commission; or
- c. using alternative means of delivering the traffic in question for termination to Northeast that does not deliver the traffic to a LEC-to-LEC network originating tandem carrier, such as contracting with interexchange carriers for delivery of HW traffic; or
- d. directly interconnecting with Northeast.

If HW chooses any of these alternatives, please notify me, ATTMo, and John Van Eschen no later than April 4, 2011 to avoid effectuation of traffic blocking.

If any questions or concerns arise regarding this notice, please direct them to me.

Sincerely,

A handwritten signature in black ink, appearing to be "CSJ", written over the word "Sincerely," and the name "Craig S. Johnson".

Craig S. Johnson

cc: Gary Godfrey
Janice Williams
John Van Eschen, Mgr. MoPSC Telecommunications Dept.
Bill Voight
John Marks



**Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law**

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Leo Bub
Counsel
AT&T Missouri
One Bell Center, Room 3520
St. Louis, MO 63101

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Northeast billed HW on February 1, 2011. HW refused to honor the invoice by letter dated February 21, 2011, saying it had no obligation to pay. This response is similar to that which is the subject of other recent blocking requests for HW traffic. In addition to this failure to compensate Northeast, based on Northeast switch records it appears that some of the traffic is wireline originated, some is interLATA wireline traffic, and HW has not delivered correct originating caller identification information to Northeast.

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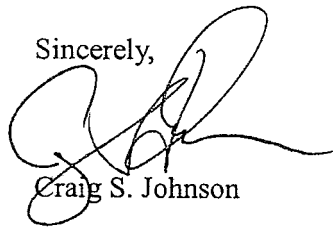
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Northeast requests that this traffic be blocked on April 11, 2011, or another date mutually agreeable to Northeast and ATTMo that is within 45 days of this request. 4 CSR 240-29.130(6).

Please let me know as soon as you can.

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cc: Gary Godfrey
Janice Williams
John Van Eschen
Bill Voight
Todd Wallace, CTO, Halo Wireless
John Marks, General Counsel, Halo Wireless

EXHIBIT 27
3/9/2011 LETTER FROM W.R. ENGLAND, III

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND
PROFESSIONAL CORPORATION

DAVID V.G. BRYDON, Retired
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
CHARLES E. SMARR
DEAN L. COOPER

312 EAST CAPITOL AVENUE
P.O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456
TELEPHONE (573) 635-7166
FACSIMILE (573) 634-7431

BRIAN T. MCCARTNEY
DIANA C. CARTER
SCOTT A. HAMBLIN
JAMIE J. COX
L. RUSSELL MITTEN
ERIN L. WISEMAN
JOHN D. BORGMAYER

COUNSEL
GREGORY C. MITCHELL

March 9, 2011

VIA EMAIL & U.S. MAIL

Mr. John Marks
General Counsel
Halo Wireless
3437 W. 7th Street, Suite 127
Forth Worth, TX 76107

Re: Blocking of Traffic

Dear Mr. Marks:

Thanks for the opportunity to talk with you and the other representatives of Halo Wireless (Halo) last Friday. While the call was helpful in better understanding Halo's position regarding a number of issues, I continue to disagree with Halo's position as it relates to: 1) the procedure for initiating negotiation and, if necessary, arbitration pursuant to Sections 251 and 252 of the Telecommunications Act (Act); and 2) the nature of the traffic Halo is sending to Citizens Telephone Company (Citizens), Green Hills Telephone Corporation, and Green Hills Telecommunications Services (collectively Green Hills).

As I understand it, Halo's position is that in order for Citizens and Green Hills to properly invoke their right to negotiation and, if necessary, arbitration under the Act, they must specifically request interconnection with Halo. As I indicated on the call, I do not agree with that position. I believe Halo's position is a strained reading of the FCC rules and one that is clearly contrary to the FCC's decision in the 2005 T-Mobile case.

As I have previously stated, Citizens and Green Hills do not seek interconnection with Halo, as an interconnection already exists, albeit indirect. This existing interconnection arrangement was unilaterally established by Halo with AT&T, without notice to Citizens and Green Hills. In fact, since our call, we have reviewed Halo's Interconnection Agreement with AT&T Missouri (AT&T) and found that Halo was obligated to establish agreements with third party carriers, such as Citizens and Green Hills, prior to transiting its traffic through AT&T to them (Section 3.1.3 of the Interconnection Agreement). Under the circumstances, it is Halo that should have requested interconnection with Citizens and Green Hills. Since Halo has not made

such a request, but nevertheless began sending traffic to Citizens and Green Hills for termination, all Citizens and Green Hills seek is an agreement establishing the appropriate rates, terms and conditions for this interconnection and the exchange of local traffic. If such an agreement cannot be negotiated, then Citizens and Green Hills believe they have the right to pursue arbitration before the Missouri Public Service Commission in accordance with the provisions and timeframes in Section 252 of the Act. In summary, Citizens and Green Hills have made an appropriate request to begin the Section 251/252 negotiation and arbitration process contemplated by the Act. Halo's insistence on a specific request to interconnect is, in my opinion, an unnecessary and unreasonable demand tantamount to a refusal to negotiate in good faith.

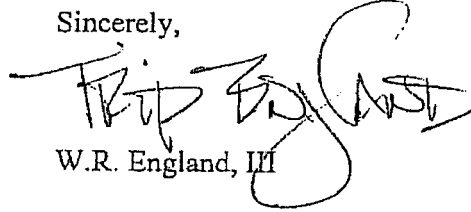
On another, and perhaps more important issue, I continue to disagree with Halo's characterization of its traffic as "intraMTA wireless" traffic. As I understand Halo's position, all of its traffic is intraMTA because it "originates" at a Transmitter Site (or Base Station) and terminates within the same MTA. As I've indicated in prior correspondence (as well as during our telephone conference), our review of Halo's traffic indicates that a substantial portion of this traffic is originating from end-users with telephone numbers (i.e., NPA-NXX) that are assigned to landline carriers. Much, if not all, of this traffic is interexchange traffic based on the end points of the calling and called parties. For example, several of the calls terminating from Halo to Citizens originated from our office in Jefferson City. Our office is equipped with a landline telephone system and all our long distance service is presubscribed to CenturyLink. A call from Jefferson City, Missouri to Higginsville, Missouri is an intrastate, interLATA interexchange call. I asked CenturyLink to investigate the routing of these calls and CenturyLink indicates these calls were handed off to a carrier by the name of "Transcom" for termination. Despite Halo's representations to the contrary, this traffic is not CMRS traffic (nor is it within the same MTA). The mere fact that this traffic passes through a "Base Station" on its way to termination to Citizens' office does not convert it into wireless traffic. It appears that Halo's involvement in the handling of this traffic is similar to the "IP-in-the-middle" argument that AT&T made some years ago in an effort to avoid paying access charges by attempting to convert what is a long distance or interexchange call into an information service. Similarly, Halo's attempt to involve wireless technology in the middle of calls that are otherwise interexchange calls does not convert them into wireless calls.

Since our call, Citizens and Green Hills inform me that as of mid-February of this year, in a substantial number of cases, they are no longer able to identify in the designated calling number field the actual calling party number (CPN) of Halo originated calls terminating to Citizens and Green Hills. Since mid-February, thousands of calls transported by Halo to Citizens and Green Hills for termination are now showing a CPN of (816) 912-1901 instead of the "true" CPN. Not only does this appear to be a violation of the Commission's Enhanced Record Exchange (ERE) Rules in 4 CSR 240-29.040(1) or (2), but it also appears to be a violation of the Federal "Truth in Caller ID Act" which prohibits any caller identification service to "knowingly transit misleading or inaccurate caller identification information with the intent to defraud, cause, harm or wrongfully obtain anything of value . . ."

Therefore, for all of the foregoing reasons, Citizens and Green Hills will not withdraw their request to AT&T to block Halo's traffic from terminating over the Missouri intrastate

intraLATA LEC-to-LEC (Feature Group C) network. As indicated in earlier correspondence, Halo will still be able to terminate traffic to Citizens and Green Hills using alternative methods/interconnection such as Feature Group D interexchange access or lease of other carriers' facilities.

Sincerely,

A handwritten signature in black ink, appearing to read "W.R. England, III". The signature is stylized with a large, sweeping "W" and a long, horizontal stroke extending to the right.

W.R. England, III

WRE/da

Cc: Leo Bub
John VanEschen
Citizens Telephone Company
Green Hills Telephone Company

EXHIBIT 28
3/14/2011 EMAIL FROM AT&T MISSOURI TO HALO WIRELESS

W. Scott McCollough

From: BUB, LEO J (Legal) [lb7809@att.com]
Sent: Monday, March 14, 2011 5:04 PM
To: wsmc@dotlaw.biz; wsmc@smccollough.com
Cc: jmarks@halowireless.com
Subject: Missouri ILECs' 4 CSR 240-29.010 et seq. Blocking Demands

Scott,

I am writing to advise that to date, we have not received an order or other directive from a commission or court of competent jurisdiction instructing us to us to delay Citizens Telephone Company of Higginsville, Missouri, Green Hills Telephone Corporation and Green Hills Telecommunications Services' (the "Missouri ILECs'") blocking demand under 4 CSR 240-29.130(2) and (5). When we spoke last Wednesday evening, you indicated that you were in the process of obtaining such an order from the FCC. I indicated that we would respect such a directive and would cease the blocking, even if it was just a letter from the FCC asking us to delay the blocking. I also indicated that Halo could effect an immediate halt to the blocking by the filing of a complaint with the MoPSC (per the MoPSC's rules, blocking could not then resume until after the MoPSC's decision). In either case, I asked that I be copied on the directive to cease the blocking. But as we have not received a request or directive from the FCC (or the MoPSC or courts), we believe that we are bound to obey the Missouri ILECs' formal demand under the MoPSC's rules. The blocking is scheduled to start at noon tomorrow, March 15, 2011.

Leo J. Bub
General Attorney - Missouri Area
One AT&T Center
909 Chestnut Street, Room 3518
St. Louis, MO 63101
tel. (314) 235-2508
fax (314) 247-0014

Notice: This e-mail is confidential and intended only for the named recipient(s) above. DO NOT FORWARD WITHOUT MY PERMISSION. It contains information that is privileged, attorney work product or exempt from disclosure under applicable law. If you have received this message in error, or are not the named recipient(s), please immediately notify me at (314) 235-2508 and delete this e-mail message from your computer. Thank you.

EXHIBIT 29
3/16/2011 LETTER FROM AT&T MISSOURI TO HALO WIRELESS



Leo J. Bub
General Attorney

AT&T Missouri
One AT&T Center
Room 3518
St. Louis, Missouri 63101

T: 314.235.2508
F: 314.247.0014
leo.bub@att.com

VIA CERTIFIED U.S. MAIL NO. 70093410000077810001 & E-MAIL

March 16, 2011

Mr. John Marks
General Counsel
Halo Wireless, Inc.
3437 W. 7th Street, Suite 127
Fort Worth, Texas 76107

Re: Blocking Request from Northeast Missouri Rural Telephone Company

Dear Mr. Marks:

We are writing to notify you that we have received and are required to implement demands from Northeast Missouri Rural Telephone Company ("Northeast"), which is located in Missouri, to block your company's traffic that transits Southwestern Bell Telephone Company, d/b/a AT&T Missouri's network and terminates to Northeast's exchanges.

Northeast has made this request pursuant to the Missouri Public Service Commission's Enhanced Record Exchange Rule which provides that:

A terminating carrier may request the originating tandem carrier to block, and upon such request the originating tandem carrier shall block, the originating carrier's Local Exchange Carrier-to-Local Exchange Carrier (LEC-to-LEC) traffic, if the originating carrier has failed to fully compensate the terminating carrier for terminating compensable traffic, or if the originating carrier has failed to deliver the originating caller identification to the transiting and/or terminating carriers.

4 CSR 240-29.130(2). The rule further provides that following the notification required by the rule and on written request by a terminating carrier:

. . . the originating tandem carrier will be required to block LEC-to-LEC traffic of an originating carrier and/or traffic aggregator to the terminating carrier. Such requests shall be based on the terminating carrier's representation that the originating carrier and/or traffic aggregator has failed to fully compensate the terminating carrier for terminating compensable traffic. . . .

Mr. John Marks
March 16, 2011
Page 2

4 CSR 240-29.110(5). The Commission's rules define "LEC-to-LEC" traffic as "that traffic occurring over the LEC-to-LEC network. LEC-to-LEC traffic does not traverse through an interexchange carrier's point of presence." 4 CSR 240-29.020(19). Similar denial of service provisions are contained in AT&T's interstate switched access service tariff, FCC No. 73, Section 2.1.3(c).

Thus, unless the Missouri Commission or other authority with competent jurisdiction issues an order staying the blocking of Halo's traffic, we believe we are bound to follow Northeast's directive. We are beginning to perform the work necessary to implement this directive and will be in a position to commence the blocking on April 19, 2011.

Please call me with questions or if you need further information.

Very truly yours,



Leo J. Bub

cc: Mr. Craig S. Johnson (Via E-Mail)
Mr. John Van Eschen, Missouri Public Service Commission
Telecommunications Department Manager (Via E-Mail)

EXHIBIT 30
3/17/2011 LETTER FROM CRAIG S. JOHNSON

**JOHNSON & SPORLEDER,
LLP**

**Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law**

March 17, 2011

Via email and certified mail

Leo Bub
Counsel
AT&T Missouri
One Bell Center, Room 3520
St. Louis, MO 63101

Re: Request for Blocking of Traffic of Halo Wireless Inc. terminating to Chariton Valley Telephone Corporation, made pursuant to the Missouri Enhanced Record Exchange Rule of the Missouri Public Service Commission.

Dear Mr. Bub:

This is a traffic blocking request made pursuant to 4 CSR 240-29.130. The terminating carrier making this request is Chariton Valley Telephone Corporation (Chariton Valley). The originating carrier whose traffic Chariton Valley is requesting ATTMO to block is that of Halo Wireless Inc., OCN 429F (HW).

Chariton Valley billed HW on February 1, 2011. HW refused to honor the invoice by letter dated March 2, 2011, saying it had no obligation to pay. This response is similar to that which is the subject of other recent blocking requests for HW traffic. In addition to this failure to compensate Chariton Valley, based on Chariton Valley switch records it appears that some of the traffic is wireline originated, some is interLATA wireline traffic, and HW has not delivered correct originating caller identification information to Chariton Valley.

Chariton Valley requests that ATTMO block HW traffic from terminating over the LEC-to-LEC network to the following Chariton Valley exchanges, except for the listed thousand blocks assigned to a competitor in the Huntsville exchange, to which calls should not be blocked pursuant to this request:

<u>Exchange</u>	<u>NPA-NXX</u>	<u>Competitor thousand number blocks</u>
Bynumville	660	222
New Cambria	660	226
Atlanta	660	239
Clifton Hill	660	261

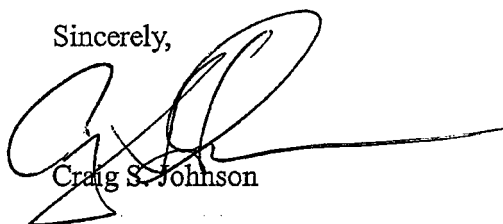
Huntsville	660	277	Big River Telephone 2000 - 2999
Jacksonville	660	295	
Salisbury	660	388	
Forest Green	660	481	
Ethel	660	486	
Bosworth	660	534	
DeWitt	660	549	
Hale	660	565	
New Boston	660	689	
Bucklin	660	695	
Callao	660	768	
Bevier	660	773	
Excello	660	775	
Prairie Hill	660	777	

Chariton Valley requests that this traffic be blocked on April 18, 2011, or another date mutually agreeable to Chariton Valley and ATTMo that is within 45 days of this request. 4 CSR 240-29.130(6).

Halo Wireless Counsel John Marks has advised that Todd Wallace is no longer with the company, and to copy Mr. Marks instead.

Please let me know as soon as you can.

Sincerely,



Craig S. Johnson

cc: James Simon
Tina Jordan

John Van Eschen
Bill Voight
John Marks, General Counsel, Halo Wireless

EXHIBIT 31
3/17/2011 LETTER FROM CRAIG S. JOHNSON

**JOHNSON & SPORLEDER,
LLP**

**Craig S. Johnson
Andrew J. Sporleder
Attorneys at Law**

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Date Traffic is Requested to be Blocked

April 18, 2011.

Actions Halo Wireless Can Take to Prevent Blocking

Halo Wireless can take any of the following actions to prevent implementation of this blocking request:

- a. agree to enter into good faith negotiations to adopt or establish an interconnection

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agreement with Chariton Valley; or

b. placing a sufficient amount of monies into escrow for Chariton Valley to recover its intrastate intraLATA access charges on all HW intrastate intraLATA traffic transited by ATTMo for termination to Chariton Valley coupled with filing a formal complaint with the Missouri Public Service Commission; or

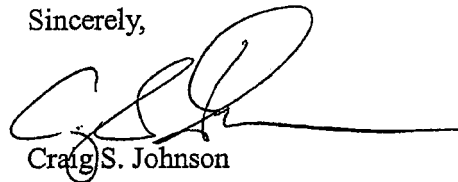
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cc: James Simon
Tina Jordan
John Van Eschen, Mgr. MoPSC Telecommunications Dept.
Bill Voight
Leo Bub

**JOHNSON & SPORLEDER,
LLP**

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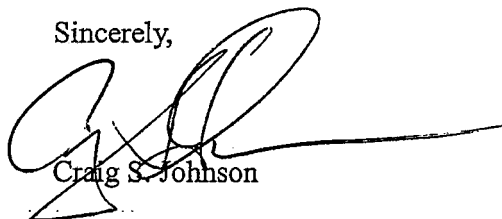
Huntsville	660	277	Big River Telephone 2000 - 2999
Jacksonville	660	295	
Salisbury	660	388	
Forest Green	660	481	
Ethel	660	486	
Bosworth	660	534	
DeWitt	660	549	
Hale	660	565	
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