

Alma Communications Company d/b/a Alma)	
Telephone Company, Chariton Valley Tele-)	
Phone Corporation, Chariton Valley Telecom)	
Corporation,Choctaw Telephone Company,)	
Mid-Missouri Telephone Company, a corporate)	
division of Otelco, Inc., and MoKAN DIAL,)	
Inc.,)	
)	
Complainants,)	
)	
vs.)	Case No.TO-2012-0035
)	
Halo Wireless, Inc., and)	
Southwestern Bell Telephone Company, dba)	
AT&T Missouri,)	
)	
Respondents.)	
and		
HALO WIRELESS, INC.,)	
)	
Complainant,)	
)	
v.)	Case No.TC-2012-0331
)	
CRAW-KAN TELEPHONE)	
COOPERATIVE, INC., et al.,)	
)	
Respondents.)	

Alma, et al, Reply to Halo Opposition to Motion to Consolidate

Come now Alma Communications Company d/b/a Alma Telephone Company, Choctaw Telephone Company, and MoKan Dial Inc., and, for their Reply to Halo's Opposition to the Motion to Consolidate, state as follows:

1. Apparently the Joint Motion to Consolidate should have been more precisely worded. Alma et al. do not believe what they intended to request is inconsistent with the abeyance Order entered in TO-2012-0035. Alma et al. simply intended that the hearing in this case be consolidated with the hearing on their interconnection agreement rejection requests pending in TO-2012-0035. One hearing could be utilized both for this docket and Alma et al.'s claims for relief pending in TO-2012-0035. The underlying facts of both cases are the same or substantially similar. At the very least there is a large body of facts common to both cases. Consolidation seems to meet the interests of efficiency set forth in 4 CSR 240-2.110(3).

2. Alma et al. did not intend to interject the legal issues in TO-2012-0035 into the prehearing or post hearing components of the procedural schedule in this case. Alma et al. simply desire to utilize a single hearing upon which both this case and TO-2012-0035 could be decided.

3. If the relief ordered in this case satisfies Alma, et al., there may be no need for relief in TO-2012-0035. If after the decision in this case relief is still desired in TO-2012-0035, the parties can take up those issues at that time with the benefit of having an evidentiary record upon which to decide the issues. Utilizing consolidation for this purpose could certainly avoid the unnecessary costs of having to create another evidentiary record. The world should continue to turn.

WHEREFORE, on the basis of the foregoing, Alma et al request that TC-2012-033 and TO-2012-0035 be consolidated for hearing.

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was electronically mailed, this 12th day of May, 2012 to all counsel of record.

/s/ Craig S. Johnson
Craig S. Johnson