

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

<b>HALO WIRELESS, INC.,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. TC-2012-0331</b>
	)	
<b>CRAW-KAN TELEPHONE</b>	)	
<b>COOPERATIVE, INC., et al.,</b>	)	
	)	
<b>Respondents.</b>	)	

**Motion to Expedite  
Motion to Dismiss Halo Complaint  
as to Respondents Alma Communications Company d/b/a Alma Telephone Company,  
Choctaw Telephone Company, and MoKAN Dial Inc.,  
for Lack of Compliance with 4 CSR 240-29.130 (9)**

Pursuant to 4 CSR 240-2.080 (14) Respondents Alma Telephone Company, Choctaw Telephone Company, and MoKan Dial Inc. hereby move that their accompanying motion to dismiss Halo's Complaint for lack of compliance with 4 CSR 240-29.130 (9) be handled expeditiously. In support hereof, Movants / Respondents state as follows:

1. Movants' blocking requests were received by Halo Wireless on February 24, 2012.
2. Said blocking requests notified Halo Wireless that the blocking requests were scheduled to be effectuated April 3, 2012.
3. Instead of immediately filing a Complaint contesting the ground for blocking upon receipt of the blocking notice, Halo waited an additional 38 days to file its purported Complaint the day before the blocking was to have been effectuated.

4. For the reasons set forth in Movants' accompanying motion to dismiss, Halo's Complaint is defective, not compliant with the Commission's rules, and was admittedly filed by Halo not to seek the affirmative relief the ERE intended of such a Complaint, but rather "out of an abundance of caution", and "under protest", as an "ostensibly-required response" to the blocking requests, and that it is requesting this Commission to declare that it lacks the jurisdiction or authority to permit blocking.

5. Halo has been terminating traffic via AT&T Missouri to Movants for over one year. Halo has paid no compensation for such traffic to Movants.

6. Movants have been attempting to block Halo traffic for approximately one year. Efforts originated in early 2011 were thwarted by Halo's filing of bankruptcy and subsequent bankruptcy proceedings.

7. After the Bankruptcy Court's October, 2011 ruling that the automatic stay did not stay state proceedings, Movants on February 22, 2011 again initiated blocking.

8. Halo's Complaint, which Movants believe to be non-compliant as well as untimely, has already caused AT&T to cancel the blocking scheduled to be commenced today.

9. Further delay will cost Movants in the form of even more Halo traffic terminated on Movants' networks without receipt of the proper compensation therefore. Other companies, who effectuated blocking prior to Halo's filing of bankruptcy, have not had to suffer such additional provision of terminating services.

10. The undersigned is unaware of any negative effect the blocking Halo traffic has had on any customers of Halo or of any other blocking MoRLEC.

11. Movants request that the Commission rule on their Motion to Dismiss halo Complaint, and authorize AT&T Missouri to immediately execute the blocking request previously scheduled for today to be performed Friday, April 6, 2012.

WHEREFORE, on the basis of the foregoing, and the accompanying motion to dismiss, Movants request that Halo's Complaint be dismissed against Movants, and that AT&T be permitted to immediately execute the blocking previously scheduled for April 3, 2012 to be performed Friday, April 6, 2012.

Respectfully submitted,

/s/Craig S. Johnson  
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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 3rd day of April, 2012 to PSC Staff Counsel, to the Office of the Public Counsel, to counsel for AT&T Missouri, to counsel for the Mo RLECs other than Movants, and to counsel for Halo Wireless Inc.

/s/Craig S. Johnson  
Craig S. Johnson