

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

In re: Interconnection Agreement by and)
Between Otelco Mid-Missouri, LLC, and)
Big River Telephone Company, LLC) Case No. _____
Pursuant to Sections 251 and 252 of)
the Telecommunications Act of 1996.)

**REQUEST OF OTELCO MID-MISSOURI, LLC
FOR APPROVAL OF AN AGREEMENT WITH BIG RIVER TELEPHONE
COMPANY, LLC PURSUANT TO THE
TELECOMMUNICATIONS ACT OF 1996**

COMES NOW Otelco Mid-Missouri, LLC, (“Otelco”) and hereby files its
Request for Approval of an Agreement between Otelco and Big River Telephone
Company, LLC (“Big River”) pursuant to the Telecommunications Act of 1996 (“the
Act”). In support of this application, Otelco states to the Commission:

1. Otelco is a small rural incumbent local exchange carrier operating in the
Mid-Missouri area.
2. Otelco is a Missouri corporation in good standing with the Missouri
Secretary of State.
3. Correspondence, orders, and decisions in this matter directed to Otelco
should be addressed to:

Todd Wessing
Vice President/General Manager
Otelco Mid-Missouri, LLC
P.O. Box 38, 215 Roe Street
Pilot Grove, MO 65276

(660) 834-3311
(660) 834-6632 FAX

and to:

Craig S. Johnson
Johnson and Sporleder, LLP
2420 Hyde Park Road, Suite C
Jefferson City, MO 65109
(573) 659-8734
(573) 761-3587 FAX

4. Big River is a competitive local exchange company operating in Missouri.
5. Correspondence, orders, and decision in this matter directed to Big River

should be addressed to:

Brian Howe
Counsel, Big River Telephone Company, LLP
24 S. Minnesota Ave.
Cape Girardeau, MO 63703
(314) 225-2205
(314) 225-2235 FAX

I. AGREEMENT REACHED

6. On August 7, 2014, after good faith negotiations, Otelco and Big River executed an (“Agreement”) pursuant to the terms of the Act (Attachment I). This is a bilateral agreement, reached as a result of negotiations and compromise between the parties.

7. Pursuant to Section 252 of the Telecommunications Act, Otelco hereby submits this Agreement for approval by the Commission.

8. The Agreement complies with Section 252(e) of the Act. The Agreement is consistent with the public interest, convenience, and necessity and does not discriminate against any telecommunications carrier. The Agreement consists of 25

pages, consecutively numbered, and several attachments and an appendix. There are no outstanding issues between Otelco and Big River that need the assistance of mediation or arbitration.

II. REQUEST FOR APPROVAL

9. Otelco respectfully requests that the Commission approve this agreement, without change, suspension or delay in its implementation.

III. COMMISSION AUTHORITY

10. Under the Federal Telecommunications Act of 1996 (“the Act”), the Commission has the authority to grant the relief requested by Otelco. Specifically, section 252 (a) of the act provides:

(a) Agreements Arrived at Through Negotiations

(1) Voluntary Negotiations - upon receiving a request for interconnection, services, or network elements pursuant to section 251, an incumbent local exchange carrier may negotiate and enter into a binding agreement with requesting telecommunications carrier or carriers without regard to the standards set forth in subsections (b) and (c) of section 251. The agreement shall include a detailed schedule of itemized charges for interconnection in each service or network element included in the agreement. The agreement, including any interconnection agreement negotiated before the date of enactment of the Telecommunications Act of 1996, shall be submitted to the state commission under subsection (e) of this section.

IV. STANDARD OF REVIEW

11. Under Section 252 of the Act, the Commission has the authority to approve this negotiated agreement. The Commission may reject an agreement if it is discriminatory to a nonparty or is inconsistent with the public interest, convenience, and necessity. Section 252(e)(2) of the act provides as follows:

Grounds for Rejection -- The State Commission may only reject –

- (A) an agreement (or any portion thereof) adopted by negotiation under section (a) if it finds that –
- (i) the agreement (or portion thereof) discriminates against a telecommunications carrier, not a party to the agreement; or
 - (ii) the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity;
12. The Agreement between Otelco and Big River satisfies these standards.

V. PRAYER FOR RELIEF

WHEREFORE, Otelco respectfully requests the Commission to issue an order that approves the traffic exchange agreement between Otelco and Big River.

/s/
Craig S. Johnson
Johnson & Sporleder, LLP
2420 Hyde Park Road, Suite C
Jefferson City, MO 65109
Phone: (573) 659-8734
Fax: (573) 761-3587
E-mail: cj@cjaslaw.com
Counsel, Otelco Mid-Missouri LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was mailed to the attorneys for Staff, OPC, and to Big River by electronic mail this 8th day of August, 2014.

/s/
Craig S. Johnson