



RICHARD TELTHORST, CAE
President

Missouri Telecommunications Industry Association

August 22, 2014

Morris L. Woodruff, Secretary
Missouri Public Service Commission
200 Madison Street, P.O. Box 360
Jefferson City, MO 65102-0360

**Re: In the Matter of the Review of the Relay Missouri Surcharge
File No. TO-2015-0032**

Dear Judge Woodruff:

Please accept these comments of the Missouri Telecommunications Industry Association ("MTIA") in response to the Missouri Public Service Commission Staff's ("Staff") Motion to Reduce the Relay Missouri Fund Surcharge.

As you know, the Staff's Motion recommends that the Commission issue an order to reduce the Fund Surcharge amount from \$.08 to \$.06 per month; maintain the existing retention amount for local exchange companies at 1% per month or \$30.00, whichever is greater; and give companies at least sixty (60) days' advance notice of any change in the assessment.

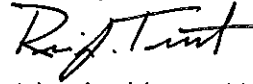
MTIA is seeking clarification over certain provisions regarding the timing of the advance notice provision. It appears that there may be some conflict or confusion between the wording in Staff's Motion and the Commission's Order regarding the 60-day notice period. For example, Staff's Motion recommended that "any Commission order [approving such reduction] become effective on October 1, 2014, approximately 60 days from this filing." MTIA is assuming that the Staff was anticipating that the Commission would issue its Order immediately so the companies would have nearly the 60 days' notice to adjust their billing systems accordingly.

The Commission's Order and Notice, issued August 6, 2014, however, directs responses to Staff's Motion be filed no later than August 25, 2014, and further provides that Staff may file a reply to any such responses no later than September 4, 2014. Thus, given the procedural schedule, any Commission Order implementing Staff's proposed reduction in the Relay Missouri Surcharge will not be issued before August 25, 2014, and possibly not until after September 4, 2014.

If such an Order were to direct that the surcharge reduction become effective on October 1, 2014, companies would have significantly less time than 60 days to make the necessary billing system changes. This could make compliance difficult or impossible. Accordingly, MTIA would respectfully request that whenever the Commission issues its Order reducing the Relay Missouri Surcharge, that it do so with a clear indication that the reduction in the surcharge will not be implemented until at least 60 days after the effective date of such Order.

MTIA appreciates the opportunity to file comments in this docket. If there are any questions regarding MTIA's request, please direct them to me at the above address.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Telthorst". The signature is fluid and cursive, with the first name "Richard" and last name "Telthorst" clearly distinguishable.

Richard Telthorst, CAE
President