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December 19, 2002

Dale Hardy Roberts  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**Re: Case No. CO-2003-0162**

**FILED<sup>3</sup>**  
**DEC 19 2002**  
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing on behalf of Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills Telecommunications Services ("GHTS"), please find an original and eight (8) copies of a Response to Staff Recommendation.

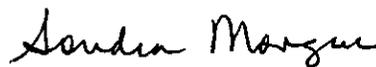
Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondra B. Morgan

SBM/lar

Enclosure

cc: William Haas  
Michael Dandino  
Lisa Cole Chase

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>3</sup>

DEC 19 2002

Missouri Public  
Service Commission

In the Matter of the Application of )  
Green Hills Area Cellular Telephone, Inc. )  
d/b/a Green Hills Telecommunications Services )  
for Designation as a Telecommunications )  
Company Carrier Eligible for Federal Universal )  
Service Support pursuant to § 254 of the )  
Telecommunications Act of 1996. )

Case No. CO-2003-0162

RESPONSE TO STAFF RECOMMENDATION

Comes now Green Hills Area Cellular Telephone, Inc. d/b/a Green Hills Telecommunications Services ("GHTS"), and for its Response to Staff Recommendation states to the Missouri Public Service Commission ("Commission") as follows:

1. On October 3, 2002, GHTS filed an application requesting designation as an eligible telecommunications carrier ("ETC") for purposes of Federal Universal Service Support pursuant to Section 254 of the Telecommunications Act of 1996.

2. On November 14, 2002, the Office of Public Counsel filed a motion requesting an evidentiary hearing, and on December 3, 2002, the Missouri Independent Telephone Group ("MITG") filed an Application to Intervene.

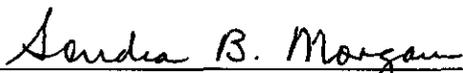
3. On December 10, 2002, the Staff filed its Response to Public Counsel's Motion for Evidentiary Hearing and Staff's Recommendation. Staff stated that it had reviewed the application and recommends that the Commission approve GHTS's application for designation as an eligible telecommunications carrier for the Norborne exchange only. Staff noted that GHTS was making the request for eligible carrier status in its capacity as a competitive local exchange telecommunications provider and that the status could only apply to the GHTS

exchange of Norborne. Staff further stated that since Norborne is a Sprint exchange, and not an MITG exchange, MITG's concerns relating to areas served by the MTIG is moot.

4. GHTS urges the Commission to adopt the Staff Recommendation. Since no facts are in dispute there is no need for an evidentiary hearing, and if Staff's Recommendation is adopted, the Commission's Order will confirm that the designation is being granted to the competitive local exchange company for the one Sprint exchange and alleviate any concerns expressed by the MITG.

Wherefore, GHTS respectfully requests that the Commission accept Staff's Recommendation and grant its application for designation as an eligible telecommunications carrier in the Norborne exchange.

Respectfully submitted,

  
W.R. England, III #23975  
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Telecommunications Services

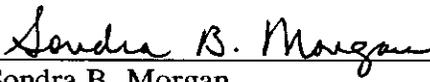
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 19<sup>th</sup> day of December, 2002, to the following parties:

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