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

Halo Wireless, Inc.,	
Complainant,	
v.	
Craw-Kan Telephone Cooperative, Inc., Ellington Telephone Company, Goodman Telephone Company, Granby Telephone Company, Iamo Telephone Company, Le-Ru Telephone Company, McDonald County Telephone Company, Miller Telephone Company, Ozark Telephone Company, Rock Port Telephone Company, Seneca Telephone Company, Alma Communications Company, Alma Telephone Company, Choctaw Telephone Company; MoKan Dial, Inc., Peace Valley Telephone Company, Inc., and, Southwestern Bell Telephone Company, d/b/a AT&T Missouri	File No: TC-2012-0331
Respondents.	

## **CLARIFICATION OF STAFF RESPONSE**

**COMES NOW** the Staff of the Missouri Public Service Commission and to clarify its response to the Commission's Order Directing Expedited Response, states as follows:

1. On April 9, 2012, the Staff filed its Response, in which it stated:

In June and July of 2011, virtually all of the "small" incumbent local exchange telecommunications companies ("LECs") filed two complaints, IC-2011-0385 and TC-2011-0404, in which they asserted that Halo

Wireless, Inc. was, in contravention of the Commission's rules and the interconnection agreements among the parties, sending certain telecommunications traffic over the "Feature Group C" (LEC-to-LEC) network that should have been sent over the "Feature Group D" (long-distance) network. Misrouting is done to avoid the higher charges the LECs may assess for terminating Feature Group D traffic rather than Feature Group C traffic.

- 2. The statement concerning the avoidance of higher charges may mislead a reader to believe that Halo is actually paying a lower rate, when, in fact, it pays nothing at all to the small companies. Halo's agreement is with AT&T, and AT&T has a relationship with the small companies. The small companies have no contractual relationship with Halo, and on that basis, Halo refuses to make any payments to the small companies even though it sends traffic to be terminated by them.
- 3. The Staff continues to believe the other assertions made in its Response to be true and correct.

WHEREFORE, the Staff clarifies its earlier statement and continues to assert that the proposed blocking is not stayed by the bankruptcy, that the Commission should dismiss this matter with no further action and it should allow the blocking pursuant to Chapter 29 begin immediately.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 2nd day of May, 2012.