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December 30, 2010

## VIA EMAIL & U.S. POSTAL SERVICE

Mr. John Marks General Counsel Halo Wireless 3437 W. 7<sup>th</sup> Street, Suite 127 Forth Worth, TX 76107

Re: Request for Interconnection & Compensation Arrangements

Dear Mr. Marks:

Our firm represents Citizens Telephone Company of Higginsville, Missouri, Inc. (Citizens), Green Hills Telecommunications Services and Green Hills Telephone Company (collectively Green Hills), which are Local Exchange Companies serving rural areas in the state of Missouri. Citizens and Green Hills have recently received billing records from their tandem provider, AT&T Missouri, indicating that Halo Wireless (Halo) is sending traffic through the AT&T tandem in Kansas City, Missouri, over the LEC-to-LEC (or Feature Group C) network for ultimate termination to customers served by Citizens and Green Hills. Currently, Halo has no agreement with either Citizens and Green Hills to terminate this traffic, and an attempt by Green Hills to bill Halo for this traffic was refused on the grounds that this traffic was wireless and therefore not subject to access charges. (See your correspondence dated December 22, 2010, a copy of which is attached). While AT&T's billing records indicate that this traffic is wireless, a review of Citizens' and Green Hills' switch records for a sample of this traffic indicates that a significant portion of this traffic appears to be wireline interexchange and 800 originating traffic (despite your representation to the contrary).

While Citizens and Green Hills acknowledge that wireless carriers are not subject to access charges for intraMTA wireless traffic, they are nevertheless subject to access charges for interMTA wireless traffic as well as interexchange wireline traffic. Moreover, the Missouri Public Service Commission (PSC) has promulgated rules which prohibit carriers, including wireless companies, from terminating InterLATA wireline traffic over the LEC-to-LEC Network. (See MoPSC Rules 4 CSR 240-29.010 et.seq.) Accordingly, Citizens and Green Hills request that Halo immediately cease terminating any interLATA wireline traffic over the LEC-

to-LEC (or Feature Group C) network. If Halo Wireless is not willing or unable to do so, Citizens and Green Hills will request AT&T to block its traffic pursuant to MoPSC Rule 4 CSR 240-29.130.

Also, Citizens and Green Hills request that Halo Wireless begin negotiations, pursuant to Section 251 of the Telecommunications Act, to establish appropriate interconnection arrangements (including reciprocal compensation) for the intraMTA wireless traffic that Halo Wireless is terminating to Citizens and Green Hills. Citizens and Green Hills currently have a number of Traffic Termination or Interconnection Agreements with wireless carriers for the indirect interconnection and exchange of intraMTA wireless traffic and they would propose using one of those agreements as a starting point for purposes of these negotiations.

In the meantime, Citizens and Green Hills request that Halo: 1) acknowledge receipt of this letter and indicate its willingness to begin negotiations towards an interconnection agreement for the exchange of, and compensation for, intraMTA wireless traffic; and 2) cease sending any InterLATA wireline traffic over the FGC network for termination to Citizens and Green Hills. Please contact me if you have any questions regarding this matter. I look forward to hearing from you.

Sincerely,

W.R. England, I

WRE/da Enclosure wireless

3437 W. 7<sup>th</sup> Street, Suite 127, Fort Worth, TX 76107

December 22, 2010

Green Hills Telephone Company Attention: Gina Hart 7926 NE State Route M P.O. Box 227 Breckenridge, MO 64625

Dear Ms. Hart:

This will acknowledge the invoice from you under your assigned invoice number 1110429F dated 11/30/2010.

Please be advised that Halo Wireless Communications is a Commercial Mobile Radio Service (CMRS) provider. The charges reflected in your statement appear to relate to intrastate access charges. Please be advised that Halo has not ordered or received any Interstate or intrastate access services from your company that could possibly be chargeable to Halo, so we have no obligation to pay them.

While there are no charges related to transport and termination of intraMTA or interMTA traffic contained in your statement, since Halo is a CMRS provider, it would have no obligation to pay such charges absent a contract in any event.

Sincerely,

John Marks General Counsel

jmarks@halowireless.com