

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

Alma Communications Company, d/b/a Alma)
Telephone Company; Chariton Valley Telephone)
Corporation; Chariton Valley Telecom Corporation;)
Choctaw Telephone Company; Mid-Missouri)
Telephone Company, a Corporate Division of)
Otelco, Inc.; and MoKan Dial, Inc.,)

Complainants,)

v.)

File No. TO-2012-0035

Halo Wireless, Inc., and Southwestern Bell)
Telephone Company, d/b/a AT&T Missouri,)

Respondent.)

STAFF'S REPLY

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), through the undersigned counsel, and respectfully states as follows:

1. On January 17, 2012, the Commission issued an Order in which it directed the Staff to file a pleading in response to the Complaint, Motions and Responses filed in this matter.

2. On January 31, 2012, AT&T Missouri filed an Answer that almost exactly coincides with the Staff's position. In that Answer, AT&T asserted that the Commission lacks the jurisdiction to re-review the interconnection agreement between AT&T and Halo Wireless, Inc. While the Staff does not conclude that the Commission is always absolutely barred from taking a second look at an approved interconnection agreement, in this case such a second look is unnecessary.

3. The Commission's Enhanced Record Exchange Rules were adopted to address exactly the situation in which the Parties to this case find themselves today. Calls that terminate

to the wireline Complainants are being improperly delivered over the LEC-to-LEC network as intra-MTA wireless calls when they are not such calls. The Commission's rules specifically require certain information about the call's origination to be carried along with the call itself (4 CSR 240-29.040) so that the terminating carrier can properly bill the call. Both AT&T (pursuant to 4 CSR 240-29.120) and the Complainant companies (pursuant to 4 CSR 240-29.130) have the authority to block calls delivered through the LEC-to-LEC network upon 30 days notice to the originating carrier and the Staff, if calls are delivered with insufficient originating information, with altered origination information or if the originating carrier fails to pay the appropriate access charges or reciprocal compensation, based on the actual call origination.

4. In each case when the call blocking on the LEC-to-LEC network is imposed, the call can and should be routed to the "Feature Group D" network, which is the network used by most interexchange carriers to carry "long distance calls" or "1+" calls. When the call is blocked, the caller reaches a recording that advises them to redial using "1+" the number they are trying to reach.

5. As the Commission has in place the procedures a terminating carrier should follow when it receives calls that do not comport with Chapter 29, including both the filing of complaints with the Commission (which the terminating carriers have done) and the blocking of calls as described above, the Staff urges the Commission to instruct AT&T and the terminating carriers to avail themselves of the call blocking provisions of its rules, after thirty days notice to the Respondent and the Staff.

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 7th day of February, 2012.

