

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

Alma Communications Company d/b/a Alma)
Telephone Company, Chariton Valley Tele-)
phone Corporation, Chariton Valley Telecom)
Corporation, Choctaw Telephone Company,)
Mid-Missouri Telephone Company, a corporate)
division of Otelco, Inc., and MoKAN DIAL,)
Inc.,)

Complainants,)

Case No. TO-2012-0035

vs.)

Halo Wireless, Inc. and)
Southwestern Bell Telephone Company, dba)
AT&T Missouri,)

Respondents.)

**AT&T'S CONCURRENCE IN COMPLAINANTS'
JOINT MOTION TO ABATE PROCEEDING**

AT&T¹ respectfully concurs in the "Joint Motion for Order Directing Case Be Held in Abeyance Pending Completion of Enhanced Record Exchange Rule Proceedings," filed February 9, 2012 by Complainants Alma Communications Company, et al. and Intervenor-Complainants BPS Telephone Company, et al. (the "Motion to Abate").

The Commission's Enhanced Record Exchange Rules, set out at 4 CSR 240-29.010 *et seq.*, provide a comprehensive procedure for terminating carriers like Complainants and Intervenor-Complainants in order to implement blocking of traffic carried over the LEC-to-LEC network "if the originating carrier has failed to fully compensate the terminating carrier for terminating compensable traffic, or if the originating carrier has failed to deliver originating

¹ Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this Concurrence as "AT&T."

caller identification to the transiting and/or terminating carriers."² The Commission's rules make a similar process available for transiting carriers such as AT&T Missouri.³

Under these procedures, a carrier seeking to initiate blocking is required to provide written notice to the originating carrier and to the manager of the Commission's Telecommunications Department at least 30 days prior to implementing the blocking. Such notice must include "the reason(s) for certain traffic to be blocked, the date the traffic block will begin, an explanation of what action the originating carrier and/or traffic aggregator should take to prevent any traffic from being blocked, when this corrective action must be completed, and the person to contact to obtain further information."⁴

The Commission's rules further provide a procedure and standards for the originating carrier to dispute the basis for the blocking and prevent the blocking pending the Commission's decision on the propriety of such blocking:

If an originating carrier and/or traffic aggregator disputes a proposal where some or all of its LEC-to-LEC traffic would be blocked by a transiting carrier, the originating carrier and/or traffic aggregator should immediately seek formal action by the commission through the filing of a formal complaint. Such a complaint shall provide all relevant evidence refuting any stated reasons for blocking such traffic. Such complaint shall include a request for expedited resolution.⁵

Upon the filing of such a complaint, the rules provide the transiting carrier "will cease blocking, pending the commission's decision."⁶

The Commission has thus put in place comprehensive procedures for resolving carrier disputes concerning the use of the LEC-to-LEC network. AT&T therefore agrees with

² 4 CSR 240-29.130(2).

³ 4 CSR 240-29.120(2).

⁴ 4 CSR 240-29.130(4) for terminating carriers; and 4 CSR 240-29.120(3) for transiting carriers.

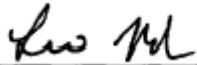
⁵ 4 CSR 240-29.120(5), and 4 CSR 240-29.130(9).

⁶ 4 CSR 240-29.120(6), and 4 CSR 240-29-130(10).

Commission Staff that there is no need for the Commission to re-examine approved interconnection agreements. AT&T respectfully concurs and joins in the Complainants and Intervenor-Complainants' Motion to Abate and respectfully requests that the Commission re-affirm the availability of the blocking procedures set out in 4 CSR 240-29.120 -130 of the Commission's rules as the appropriate remedy for carriers to address disputes for nonpayment of compensable traffic or for failure to deliver originating caller identification.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY,
D/B/A AT&T MISSOURI

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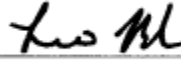
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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on February 14, 2012.



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