

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of Big River Telephone Company, )  
LLC’s Request for Expedited Approval of its ) Case No. TT-2010-0141  
Tariff Change Introducing Foreign Exchange ) (Tariff No. YL-2010-0326)  
Service. )

**Objection to Motion for Expedited Treatment  
Chariton Valley Telephone Corporation**

Comes not Chariton Valley Telephone Corporation and objects to Big River’s November 3, 2009 Motion for Expedited Treatment. Big Rivers’ allegations in support of its motion for expedited treatment are either false or misleading. Chariton Valley will be filing a separate motion to suspend and investigate the proposed tariff filing.

1. Big River’s request for expedited treatment is not justified. Any immediate need for tariff consideration is due to Big River’s failure and delay in disclosing the true facts.
2. Big River contacted Chariton Valley on August 20, 2009 with respect to the underlying situation. However Big River did not then disclose that it had assigned an NPA/NXX rated for the Salisbury rate center to a customer physically located within Huntsville, a separate rate center (this is a “virtual NXX” that is prohibited by the interconnection agreement between Big River and Chariton Valley).
3. It was over two months later, in an email from Mr. Lumley on Thursday, October 29, 2009, that Big River disclosed that it had assigned a Salisbury number to a customer located in Huntsville.

4. By the following Monday, November 2, Chariton Valley informed Big River that this virtual number was prohibited by the North American Number Plan rules, also by the approved interconnection agreement, and that the correct action for Big River to take was to obtain a number by making the proper request from the NANPA Code/Pooling Administrator.

5. Instead of adhering to the numbering plan conventions and its contract with Chariton Valley, Big River filed its proposed tariffs and motion for expedited treatment on November 3.

6. If there is some immediacy here, it is due to Big River's failure to disclose the true facts for over two months. There is no justification for expedited treatment.

7. In Big River's motion it states that it has placed an order for an entire 10,000 block of numbers as a "backup" plan. However BR also states that, if the Commission approves its tariffs, it will cancel that order.

8. Chariton Valley informed Big River that the correct solution to this situation was to obtain numbers properly assigned to the rate center where the customer was located. Big River states that it has "placed an order for a 10,000 block of numbers for service in Huntsville". It appears Big River may have intentionally requested an entire 10,000 block of numbers, rather than resources sufficient to meet Big River's reasonably foreseeable needs. Chariton Valley is concerned that Big River intentionally made a request it knew would not be accepted. The appropriate request Big River should make with the Code/Pooling Administrator is to request an individual thousand block of numbers. A request for an entire new NXX code is not appropriate.

9. Big River's proposed tariff assumes that Big River will continue to use virtual NXXs, even though such use is in violation of number assignment conventions, and in violation of the approved interconnection agreement. The proposed tariff would further muddy the water by overlaying fictitious foreign exchange service and EAS arrangements upon virtual NXX. This concoction would be unnecessary if Big River would abide by the interconnection agreement and obtain numbers properly assigned to the rate center for which the customer will reside.

10. Chariton Valley will be filing a Motion to Suspend and Investigate this Tariff. In the meantime Big River's Motion for Expedited Treatment should be denied. There are complex underlying considerations of virtual NXX use, proper numbering resources use, and the proper use of foreign exchange service. There is also the potential for unintended consequences with respect to exchange, rating, routing, billing record creation, billing record exchange, and the appropriate handling of intercompany compensation. These consequences could impact carriers other than Big River and Chariton Valley. This Commission should fully investigate and address those issues before determining whether the proposed tariffs of Big River should be allowed to go into effect.

WHEREFORE, Chariton Valley requests that Big River's Motion for Expedited Treatment be denied.

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this pleading was electronically mailed to the following attorneys of record in this proceeding this 5th day of November, 2009:

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