

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

In the Matter of the Lifeline and Link Up)	
Tariff Revisions Required by the Federal)	File No. IO-2012-0292
Communications Commission)	Tariff No. JI-2012-0431

In the Matter of the Lifeline and Link Up)	
Tariff Revisions Required by the Federal)	File No. CO-2012-0293
Communications Commission)	Tariff No. JC-2012-0432

STAFF RESPONSE IN OPPOSITION TO EXPEDITED TREATMENT

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

1. On March 9, 2012, Green Hills Telephone Corporation and Green Hills Telecommunications Services (collectively referred to as "the Company") filed Motions for Expedited Treatment and For Approval of Tariff Sheets on Less Than Thirty Days' Notice with the Missouri Public Service Commission ("Commission") in the above-referenced cases. With its motions, the Company also filed amended tariffs with expedited effective dates. The expedited effective dates were meant to timely comply with a Report and Order recently issued by the Federal Communications Commission ("FCC").

2. The Staff agrees that the FCC has required changes to the Lifeline and Linkup programs that will take effect on April 1 and 2. The Staff also agrees that the changes to those programs will necessitate changes in tariffs filed with the Commission. However, the Staff opposes granting expedited treatment.

3. Every incumbent local exchange telecommunications company and many competitive telecommunications companies presently offer Lifeline and Linkup. The Commission has received tariff revisions from one company, the first to file, and it would require expedited treatment to change Missouri tariffs simultaneously with the FCC's mandated changes. The Commission will find it increasingly difficult to sufficiently expedite review of the tariff revisions as the remaining two weeks until effectiveness pass. Furthermore, the Staff would like the opportunity to review the filings, not because it anticipates that the Staff may oppose them, but to ensure that the revisions are correct. More than fifty tariff filings in the next two weeks are more than can be effectively reviewed.

4. The Staff proposes that the tariffs remain on the 30-day time frame set out in the Commission's regulations and governing statutes. After 30 days, the tariff revisions would become effective by operation of law. This would result in inconsistent Lifeline rates (the federal rate would govern) until the Missouri tariffs took effect. While this proposal is far from perfect, the Staff can find no other reasonable alternative. The tariffs, to go into effect by operation of law, must be filed on thirty days' notice. Anything faster would require that the Commission grant expedited treatment, the filing of a Staff Recommendation and the issuance of an Order Approving the tariff changes.

5. Finally, Staff Counsel is advised by the Company's counsel that industry groups are diligently working with the FCC to extend the deadline. If the tariffs are filed on a regular, 30-day basis, an extension of the deadline can be easily accommodated. Once these tariffs are approved, if the deadlines are

extended, then there would again be an inconsistency between the rate charged and the tariff.

WHEREFORE, the Staff opposes the requested expedited treatment and asks the Commission to require the Company to substitute tariff sheets with a thirty day effective date.

Respectfully submitted,



Colleen M. Dale
Senior Counsel
Missouri Bar No. 31624
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4255 (Telephone)
cully.dale@psc.mo.gov

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 13th day of March, 2012.

