BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Local Exchange Rate	)	
Tariff Filing of Seneca Telephone	)	**File No. IT-2012-0430**
Company to Comply with the FCC's	)	Tariff No. YI-2012-0821
April 25, 2012 Second Order on	)	
Reconsideration	)	

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and for its response and recommendation states:

1. On June 18, 2012, Seneca Telephone Company ("Seneca Telephone") issued a tariff revision that will alter its state access tariff provisions regarding intrastate Voice over Internet Protocol (VoIP) traffic. That tariff revision carries a thirty-day effective date of July 18. However, along with its tariff revision, Seneca Telephone filed a motion asking the Commission to approve the tariff revision on an expedited basis so that the tariff can go into effect on July 13.

2. The Staff recommends that the tariff be approved without suspension or further proceedings in this matter. The Staff has reviewed the proposed tariff (see the attached Memorandum) and has no objection to its approval on an expedited basis.

WHEREFORE, the Staff recommends that the Commission approve the proposed tariff to become effective on or before July 13, 2012.

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 25th day of June, 2012.

M E M O R A N D U M

To: Missouri Public Service Commission Official Case File
Case No. IT-2012-0430 File No. YI-2012-0821
Company Name: Seneca Telephone Company

From: Kari Salsman
Telecommunications Department
William Voight
Tariff, Safety, Economic and Engineering Analysis

Subject: Expedited Treatment and Revised Tariff Filing of Seneca Telephone Company to Comply with the FCC's April 25, 2012 Second Order of Reconsideration

Date: June 25, 2012

On November 18, 2011, The Federal Communications Commission (FCC) issued its USF/ICC Transformation Order which required all incumbent local exchange carriers (ILECs) to file new state access tariff provisions to address intrastate Voice over Internet Protocol (VoIP) traffic. Seneca Telephone Company made these tariff filings which are in effect.

On April 25, 2012 the FCC issued its Second Order of Reconsideration which modified the compensation of originating VoIP-PSTN traffic on a prospective basis. Intrastate access rates shall apply to intrastate, originating VoIP traffic on a prospective basis (beginning July 13, 2012) for an interim period ending June 30, 2014. The Second Order was not published in the Federal Register until May 29, 2012. According to Seneca Telephone Company, the company acted as soon as possible to file the pleading and requests action as soon as possible, and no later than July 13, 2012, in order to allow an order granting expedited approval to become effective. Amending the tariff with less than 30 days notice will make the tariff consistent with federal law and the federally-prescribed rate. This will not have any negative effect on the customers and will avoid having an incorrect rate for intrastate originating VoIP traffic in their tariff.

Staff requests the Commission grant expedited treatment and approve the tariff sheets to go in effect on July 13, 2012. Staff has examined Seneca Telephone Company's annual filings with the Commission and Staff notes the Company is not delinquent in any submittals.

Under penalty of perjury, I affirm that the above statement is true and correct.

Kari Salsman

KARI SALSMAN