

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of)
Application of Boomerang Wireless, LLC d/b/a) **Case No. RA-2013-0115**
enTouch Wireless for Designation as an Eligible)
Telecommunications Carrier on a Wireless)
Basis (Low Income Only))

MOTION FOR LEAVE TO FILE FIRST AMENDED APPLICATION

COMES NOW Boomerang Wireless, LLC d/b/a enTouch Wireless (hereinafter “enTouch” or “Applicant”), pursuant to 4 CSR 240-2.080(18), and moves for leave to file its first amended application in the above-referenced matter. In support thereof, Applicant submits the following:

1. Applicant filed its application for Designation as an Eligible Telecommunications Carrier (“ETC”) in the State of Missouri on September 21, 2012.
2. Since the time of the filing of the application, the Staff of the Commission has propounded several data requests which question the name under which Applicant shall be certified and designated.
3. For purposes of clarifying the name under which Applicant intends to provide the services applied for herein, and otherwise to harmonize the application with regulatory policies of this Commission, Applicant has prepared a first amended application a copy of which is attached hereto.
4. This motion is not filed for purposes of delay and granting this motion will prejudice no party. Since the amendment should resolve questions concerning the entity which will be certified and designated, good cause exists to grant this motion.

WHEREFORE, Boomerang Wireless, LLC d/b/a enTouch Wireless respectfully requests that the Commission grant its motion for leave to file its first amended application and further order that the first amended application shall be deemed filed as of the date of this motion.

Respectfully submitted,

/s/ Mark W. Comley

Mark W. Comley #28847
Newman, Comley & Ruth P.C.
601 Monroe Street, Suite 301
P. O. Box 537
Jefferson City, Missouri 65102-0537
Telephone: (573) 634-2266
Facsimile: (573)636-3306
Email: comley@ncrpc.com

and

J. Andrew Gipson
Jones, Walker, Waechter, Poitevent,
Carrère & Denègre L.L.P.
190 E. Capitol Street, Suite 800 (39201)
P. O. Box 427
Jackson, Mississippi 39205-0427
Telephone: (601) 949-4900
Facsimile: (601) 949-4804
E-mail: agipson@joneswalker.com

Attorneys for BOOMERANG WIRELESS, LLC

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 11th day of February, 2013, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley