

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

In the Matter of the Application of)
dPi Teleconnect, LLC for Designation as)
an Eligible Telecommunications Carrier.) **File No. CO-2010-0054**

STAFF’S MOTION TO AMEND COMMISSION ORDER

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned attorney, and moves for the Commission to amend its January 19, 2011 Order, to remove the requirement that dPi Teleconnect, LLC (dPi), file a tariff concerning its wireless ETC services. For this motion, the undersigned respectfully states as follows:

1. On January 19, 2011, the Commission issued its *Order Granting Application to Amend Designation as an Eligible Telecommunications Carrier*. Within the ordered Paragraph three (3), the Commission adopted the Staff’s recommendation that prior to dPi’s provision of any wireless service that the Company have on-file an updated tariff with the Commission an effective date thirty days from the date of issuance stating the rules and regulations governing the Company’s provision of such services.

2. While the tariff requirement is applicable to dPi’s ETC status for wireline services that the Commission approved in June 2010, this requirement is not applicable to Commercial Mobile Radio Service (CMRS) providers. In error, the undersigned recommended the tariff filing instead of advising the Commission of the similar informational filing required for dPi’s wireless ETC services pursuant to 4 CSR 240-3.570 (3)(D).

3. While dPi did not object to the tariff language within the Staff’s December 30, 2010 *Staff Recommendation on Amended Application*, the undersigned requests that the Commission remove Paragraph three (3) from its January 2011 Order, and replace it with the corrective CMRS requirement found in 240-3.570 (3)(D): “Within thirty (days) of receiving

ETC status, each CMRS carrier designated as an ETC shall make an informational filing with the commission consisting of a complete description of all of its service offerings. Such informational filings will be amended as service offerings are introduced or modified.”

4. The undersigned has discussed this corrective motion with counsel for dPi, who does not object to its filing.

WHEREFORE, the Staff respectfully requests that the Commission issue an order to amend its January 2011 *Order Granting Application to Amend Designation as an Eligible Telecommunications Carrier* to remove the language of ordered Paragraph three (3), to replace that language with the following requirement: “Within thirty (days) of receiving ETC status, dPi Teleconnect, LLC, shall make an informational filing with the Commission consisting of a complete description of all of its service offerings. Such informational filings will be amended as service offerings are introduced or modified.”

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on Mark P. Johnson and Lisa Gilbreath, Sonnenschein Nath & Rosenthal LLP, Attorneys for dPi Teleconnect, LLC, at mark.johnson@snrdenton.com and lisa.gilbreath@snrdenton.com; and The Office of Public Counsel at opcservice@ded.mo.gov this 28th day of January, 2011.

/s/ Jennifer Hernandez