

**BEFORE THE MISSOURI  
PUBLIC SERVICE COMMISSION**

**Application of Blue Jay Wireless, LLC** )  
**For Designation as an Eligible** )  
**Telecommunications Carrier for the** ) **File No. TA-2013-0272**  
**Purpose of Offering Lifeline Service** )  
**on a Wireless Basis** )

**BLUE JAY WIRELESS, LLC'S RESPONSE TO STAFF REPLY**

Blue Jay Wireless, LLC (“Blue Jay” or the “Company”), by its counsel, respectfully submits this Response to Staff Reply pursuant 4 CSR 240-2.080(13).

1. On or about November 13, 2012, Blue Jay applied to the Missouri Public Service Commission (“Commission”) for designation as a wireless ETC in Missouri for the sole purpose of receiving federal universal service Lifeline support. It sought leave to amend that application on December 6, 2012.

2. On December 12, 2012, Staff filed its reply to prior Commission order indicating that it does not expect to be able to develop and submit a recommendation for six to nine months, citing the general need to conduct discovery and for Staff and FCC review.

3. Blue Jay has already timely responded to Staff’s first set of data requests and will continue to promptly respond to relevant inquiries and otherwise cooperate to facilitate Staff’s efforts to develop a recommendation. While it cannot predict FCC action with certainty, Blue Jay reasonably anticipates FCC approval of its compliance plan in the near term and is not aware of anything else pertinent to be addressed by the FCC.

4. A six to nine month delay in these proceedings seems unduly prolonged and would negatively impact the company.

5. Blue Jay respectfully requests the Commission to set a more proximate date for a detailed Staff status report, rather than deciding now to allow Staff to take up to nine months to file its recommendation. Blue Jay suggests a report date of January 31, 2013.

WHEREFORE, Blue Jay hereby requests the Commission to direct Staff to file a detailed status report by January 31, 2013.

**BLUE JAY WIRELESS, LLC**

/s/ Carl J. Lumley

By \_\_\_\_\_

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*Attorneys for Blue Jay Wireless, LLC*

Date: December 12, 2012

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing has been served by forwarding the same by electronic mail and/or first class mail, postage prepaid this 12<sup>th</sup> day of December, 2012 to the following:

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/s/ Carl J. Lumley

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