

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

In the Matter of the Tariffs to Reduce Access)	
Rates of Local Telecommunications)	
Companies Pursuant to the Federal)	File No. TT-2012-0317
Communications Commission Report and)	
Order FCC 11-161)	

**The Missouri Small Telephone Company Group's
Reply to Public Counsel Comments on Staff's Motion to Open Docket**

Comes now the Missouri Small Telephone Company Group ("STCG")(see Attachment A), and for its Reply to the Office of Public Counsel's Amended Response to the Missouri Public Service Commission ("Commission" or "PSC") Staff's Motion to Open Case in this matter, states to the Commission as follows:

1. The Missouri Small Telephone Company Group (STCG) consists of small rural incumbent local exchange carriers (ILECs) providing telecommunications services in high cost, low density areas of the state. These companies have been directly impacted by the Federal Communications Commission (FCC) *USF/ICC Transformation Order* issued on November 18, 2011 (*FCC Order*).¹

2. The STCG generally concurs with the Replies to Public Counsel filed by AT&T Missouri and Alma Telephone Company et al. in this case. In short, Staff's motion represents a logical and workable approach to dealing with the access rate reductions mandated by the FCC.

3. The STCG companies are working diligently to meet Staff's proposed deadline for filing access tariff revisions. However, if some companies are unable to

¹ *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 10-90 et al., FCC 11-161.

complete their filings to meet Staff's recommended 60-day advance filing requirement, then the Commission should allow a procedure to grant reasonable extensions.

WHEREFORE, the STCG respectfully requests that the Commission grant Staff's March 23, 2012 Motion to Open docket and also establish a reasonable mechanism to allow extensions where necessary.

Respectfully submitted,

By: /s/ Trip England

W.R. England, III Mo. #23975
Brian T. McCartney Mo. #47788
Brydon, Swearingen & England P.C.
312 East Capitol Avenue
Jefferson City, MO 65102-0456
trip@brydonlaw.com
bmccartney@brydonlaw.com
(573) 635-7166
(573) 634-7431 (Fax)

Attorneys for the STCG

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the above and foregoing document were sent by electronic mail, or hand-delivered, on this 2nd day of April, 2012, to:

General Counsel
Missouri Public Service Commission
Governor Office Building, 8th Floor
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov

Office of the Public Counsel
Governor Office Building, 6th Floor
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

Craig Johnson
Johnson and Sporleder, LLP
304 E. High Street, Suite 200
P.O. Box 1670
Jefferson City, MO 65102
cj@cjaslaw.com

Leo Bub
AT&T
909 Chestnut Street, Room 3518
St. Louis, MO 63101
leobub@att.com

/s/ W.R. England
W.R. England

ATTACHMENT A

BPS Telephone Company
Citizens Telephone Company of Higginsville, Mo.
Craw-Kan Telephone Cooperative, Inc.
Ellington Telephone Company
Farber Telephone Company
Fidelity Telephone Company
Goodman Telephone Company
Granby Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
K.L.M. Telephone Company
Lathrop Telephone Company
Le-Ru Telephone Company
Mark Twain Rural Telephone Company
McDonald County Telephone Company
Miller Telephone Company
New Florence Telephone Company
New London Telephone Company
Northeast Missouri Rural Telephone Company
Orchard Farm Telephone Company
Oregon Farmers Mutual Telephone Company
Ozark Telephone Company
Peace Valley Telephone Company, Inc.
Rock Port Telephone Company
Seneca Telephone Company
Steelville Telephone Exchange, Inc.
Stoutland Telephone Company