

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of Big River Telephone Company,)	
LLC's Request for Expedited Approval of its)	Case No. TT-2010-0141
Tariff Change Introducing Foreign Exchange)	
Service.)	

BIG RIVER TELEPHONE COMPANY, LLC'S
RESPONSE TO CHARITON VALLEY TELEPHONE CORPORATION'S
OBJECTION TO MOTION FOR EXPEDITED TREATMENT

COMES NOW Big River Telephone Company, LLC ("Big River") pursuant to 4 CSR 240-2.080(15), and for its Response to Chariton Valley Telephone Corporation's Objection to Motion for Expedited Treatment states as follows:

Big River is simply trying to provide service in Huntsville without wasting numbering resources. To the best of its knowledge and understanding, after diligent investigation, it cannot obtain a current 1000-block for Huntsville because there is currently only one 10,000 block assigned to Huntsville (660-277) and it is owned by Chariton Valley Telephone Company. Chariton has not offered any portion of its 10,000 block for number pooling (perhaps in violation of 4 CSR 240-37.030). Hence, Big River can only obtain a new 10,000 block of numbers. While Big River has ordered a 10,000 block for Huntsville, it has already indicated to the number administrator that Big River would only retain 1,000 of the 10,000 numbers, releasing the remaining 9,000 numbers back to the number administrator for future assignment. This is standard operating procedure for Big River whenever it is forced to acquire a full 10,000 block. Regardless, all 10,000 of the new numbers ordered by Big River would become needlessly dedicated to Huntsville, to Big River's understanding. If Big River's understanding is correct, that would isolate two full 10,000 blocks of numbers to the Huntsville rate center that serves a population of approximately 2,000 people.

There is no impact on Chariton, or any other carriers, if a few Big River customers in Huntsville, who don't port an existing local number, use numbers from an existing 1000 block "Salisbury" NXX code that has been made available to Big River. The local calling scope is the same and compensation for local calling (per Big River's interconnection agreement with Chariton Valley) and compensation for local exchange access (per Big River's and Chariton Valley's access tariff) are unaffected because of the mandatory local calling area between Salisbury and Huntsville. The proposed tariffs for Big River's new FX service make clear that Salisbury is only included in connection with FX service for customers in Huntsville. There is no "virtual NXX" involved.

Further, Big River's interconnection agreement with Chariton Valley specifically allows for FX service and makes appropriate accommodation for compensation purposes.

This is strictly a matter of number conservation. Big River can make use of a block of 1000 numbers already assigned to it in Salisbury, or it can take action that will result in tying up a second block of 10,000 numbers for Huntsville. Clearly, the second option is wasteful. Chariton's objections are irrational and unfathomable.

WHEREFORE, Big River moves the Commission to approve Big River's proposed FX tariff filing and for such other and further relief as it deems meet and proper.

Respectfully submitted,

/s/ Carl J. Lumley

Carl J. Lumley, #32869
Curtis, Heinz, Garrett & O'Keefe, PC
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
Telephone: (314) 725-8788
Facsimile: (314) 725-8789
Email: clumley@lawfirmemail.com

ATTORNEYS FOR BIG RIVER TELEPHONE
COMPANY, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served upon the parties listed below on this 6th day of November, 2009 by either e-mail or U.S. Mail, postage prepaid.

/s/ Carl J. Lumley

Carl J. Lumley

Office of the Public Counsel
PO Box 2230
Jefferson City, Missouri 65102
opcservice@ded.mo.gov

Office of General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov

Craig S. Johnson, Of Counsel
Berry Wilson, LLC
304 E High St. Suite 100
P.O. Box 1606
Jefferson City, MO 65102
(573) 638-7272
(573) 638-2963 FAX
craigsjohnson@berrywilsonlaw.com