BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of)	
T-Mobile Central LLC for Designation as an)	Case No. RA-2012-0195
Eligible Telecommunications Carrier)	
For Purposes of Low Income Support Only)	
)	

FIRST SUPPLEMENT TO RESPONSE TO STAFF RECOMMENDATION TO DENY APPLICATION OF T-MOBILE CENTRAL LLC FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

COMES NOW T-Mobile Central LLC ("T-Mobile" or "Company") and, pursuant to 4 CSR 240-2.080(18) and 4 CSR 240-2.090(2), for its First Supplement to its Response to the Missouri Public Service Commission Staff ("Staff") Recommendation to Deny T-Mobile's Application for Designation as an Eligible Telecommunications Carrier ("ETC") for Purposes of Low Income Support, and for the purpose of updating responses to Staff DR0001, request number 4, described in detail in T-Mobile's responsive pleading, states as follows:

- 1. On May 10, 2012, T-Mobile timely filed its Response to Staff Recommendation to Deny Application of T-Mobile for designation as an Eligible Telecommunications Carrier for Designation as an Eligible Telecommunications Carrier ("Response") in the above-captioned case.
- 2. On May 11, 2012, the Missouri Public Service Commission ("Commission") issued an order directing Staff to file a response by May 18, 2012, to the T-Mobile Response.

- 3. In paragraphs 22-25 of its Response, T-Mobile explained the context of fines previously assessed by the Puerto Rico Telecommunications Regulatory Board ("TRB") in a generic order issued on all ETCs operating in Puerto Rico January 24, 2012, including T-Mobile Puerto Rico LLC ("T-Mobile PR"), for alleged failure to comply with certain new reporting requirements pursuant to recently approved emergency regulations. T-Mobile had noted in its April 30, 2012 Supplement that the fines were being held in abeyance by the TRB.
- 4. In paragraph 25 of its Response, T-Mobile stated that the TRB had previously stated that if ETCs filed their monthly reports on a timely basis, then the TRB would eliminate the fines. T-Mobile PR asserted that although it had fulfilled its new monthly filing obligation, the TRB had not addressed the fines imposed on T-Mobile PR.
- 5. On May 11, 2012, the TRB issued an order entitled *Resolucion Y Orden* ("Resolution and Order") addressing the fines being held in abeyance, which order is attached.¹ A certified translator has verified for T-Mobile that the TRB's Resolution and Order eliminates the fines against T-Mobile. The TRB eliminated fines against T-Mobile and certain other ETCs that had satisfied the new monthly filing obligations. The TRB reinstated fines against Open Mobile and Sprint. T-Mobile will submit a certified translation of the TRB's Resolucion Y Orden as soon as practical.

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Exhibit A

WHEREFORE, T-Mobile Central LLC supplements its Response To Staff
Recommendation To Deny Application Of T-Mobile Central LLC For Designation As An
Eligible Telecommunications Carrier, and its Response to DR0001, Request Number 4, as
amended on April 30, 2012.

Respectfully submitted,

/s/ Lisa A. Gilbreath

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ATTORNEYS FOR T-MOBILE CENTRAL LLC

Certificate of Service

I hereby certify that on this 15th day of May, 2012 copies of the foregoing have been mailed, transmitted by facsimile, or emailed to all counsel of record.

/s/ Lisa A. Gilbreath

Attorney for T-Mobile Central LLC