

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Revocation of the)	
Eligible Telecommunications Carrier Designation)	File No. RC-2016-0278
of Total Call Mobile, Inc.)	

RESPONSE TO STAFF SUBMISSION

Comes now Total Call Mobile, Inc. by and through the undersigned counsel, and pursuant to 4 CSR 240-2.080 hereby responds to the Staff's Submission on June 28, 2016. Attached hereto Total Call Mobile provides a response it made to the FCC's Wireline Competition Bureau (WCB) regarding the assertions in the FCC Temporary Hold order submitted by Staff. The attached response was provided on a confidential basis to the WCB and is filed as a Proprietary document pursuant to the Protective Order issued in this case, as it concerns proprietary technical and business information. Total Call Mobile continues to provide information to and cooperate with the FCC's WCB and believes the FCC will lift the Temporary Hold Order upon completion of its review of the information submitted.

WHEREFORE, to the extent the Commission considers the FCC order submitted by Staff, Total Call Mobile, Inc. respectfully requests that the Commission also take into account the attached response and any related information as may be provided subsequently.

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

s/ Carl J. Lumley

Carl J. Lumley, MBE #32869
130 S. Bemiston, Suite 200
Clayton, Missouri 63105
Telephone: (314) 725-8788
Facsimile: (314) 725-8789
Email: Clumley@chgolaw.com

Attorneys for Total Call Mobile, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served upon the parties listed below on this 30th day of June, 2016, 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

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