

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

In the Matter of the Application of Easy Telephone)
Service Company for Designation as an)
Eligible Telecommunications Carrier in the) **File No. TA-2011-0164**
State of Missouri)

STAFF RESPONSE TO MOTION FOR DISCLOSURE

COMES NOW the Staff of the Missouri Public Service Commission and for its recommendation, states as follows:

1. On December 7, 2010 Easy Telephone Service Company (“the Company”), a wireless carrier, filed an application with the Missouri Public Service Commission seeking designation as an Eligible Telecommunications Carrier (“ETC”) for the purpose of receiving federal universal service fund support for low income customers through Lifeline and LinkUp programs.

2. On February 17, 2011, the Staff received an e-mail that set alleged improprieties and fraud to the federal Universal Service Fund. The Staff attached a redacted copy of the e-mail to its Amended Recommendation (Appendix A), asserting that it could no longer support ETC designation. Appendix A was forwarded to the Staff by the Universal Service Administrative Company (“USAC”), having originally received the information pursuant to its Whistleblower procedures.

3. On March 8, 2011, the Company filed a request for an unredacted version of Appendix A, so that it could adequately respond to the allegations contained therein.

4. USAC’s Whistleblower Alert system states as follows concerning confidentiality:

1. Contact USAC as described below.

2. The USAC staff person who contacts you will ask a series of questions to obtain as much information about the situation as possible.

o You may choose to remain anonymous. If you opt to identify yourself so USAC can contact you for additional information, we will make every effort to maintain confidentiality as the investigation proceeds. If appropriate, USAC will turn over the report and results of our investigation to the FCC or law enforcement.

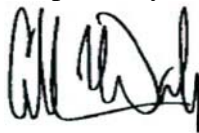
3. After your report is received, it will be investigated. Because the report and investigation are confidential, USAC is not at liberty to provide the status or outcome of the investigation.

For these reasons, the Staff redacted the Appendix prior to filing.

5. The Staff does not oppose limited disclosure of some of the redacted information to the Company's counsel as Highly Confidential or Proprietary, pursuant to §386.480 RSMo and 4 CSR 240-2.135, as the Company claims it cannot investigate or refute the allegations with so much information redacted. The Staff believes two options are appropriate: 1) Classify all information except the whistleblower identifiers as Proprietary and the whistleblower identifiers as Highly Confidential, or 2) Classify all information except the whistleblower identifiers as Highly Confidential and the whistleblower identifiers remain redacted.

WHEREFORE, the Staff requests that the Commission determine the amount and level of disclosure the Staff should make to the Company of the information contained in Appendix A of its previous filing.

Respectfully submitted,



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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 9th day of March, 2011.

