

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

In the Matter of the Application of Northeast)	
Missouri Rural Telephone Company and)	<u>File No. TO-2012-0155</u>
Northeast Missouri Long Distance, L.L.C. for)	Tariff No. JX-2012-0230
Waiver of 4 CSR 240-33.150(4))	

STAFF RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its Response to the Request for Clarification in this matter states:

1. On December 1, 2011, the Missouri Public Service Commission (“Commission”) issued an Order in which it recognized the election of waiver pertaining to the internal reorganizations such as Northeast Missouri Rural Telephone Company and Northeast Missouri Long Distance, L.L.C. (“the Companies”) are undertaking presently.

2. Also on December 1, the Companies requested clarification that the certificate of interexchange telecommunications service authority of Northeast Missouri Long Distance, L.L.C. is transferred to Northeast Missouri Rural Telephone Company. The Staff has seen the Request and has no disagreement with the substance of the request.

3. The Staff notes that certificates are not “transferable.” However, it is clear that the change of name, dissolution of the subsidiary and adoption of its tariffs by the parent company results in the IXC certificate resting in the hands of the parent, in a manner transparent or virtually transparent to customers. The Staff agrees with the Companies’ request that the Commission’s Order in this matter unambiguously state

that, as of January 1, 2012, Northeast Missouri Rural Telephone Company will hold the IXC certificate. The Staff was remiss in not mentioning this in its recommendation and apologizes for any inconvenience it may have caused.

WHEREFORE, the Staff supports the Companies request that language to the effect of the following be added to the ordered paragraphs of its Order Concerning Election of Waivers:

As of January 1, 2012, Northeast Missouri Rural Telephone Company will hold the IXC certificate previously held by Northeast Missouri Long Distance, L.L.C.

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 1st day of December, 2011.

