

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

In the Matter of a Repository Docket in which to	)	
Receive Feedback and Other Suggestions	)	
Concerning Staff's Proposed Consolidation and	)	File No. TW-2014-0295
Simplification of the Commission's	)	
Telecommunications Rules.	)	

**THE OFFICE OF THE PUBLIC COUNSEL'S RESPONSE  
TO STAFF'S MOTION**

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response to Staff's Motion states as follows:

1. On April 17, 2014, the Staff of the Missouri Public Service Commission (Staff) filed a Motion to Open a Repository Docket with the Missouri Public Service Commission (Commission). In its Motion, Staff requested that the Commission open a repository docket in which to receive feedback and other suggestions concerning Staff's proposed consolidation and simplification of the Commission's rules that govern telecommunications companies and IVoIP providers. In its Motion, Staff asked that the Commission solicit feedback on the following questions from any interested persons:

- a. Does the commenter have any objections to any substantive changes in the proposal? If the objection is a legal one, please provide citations. If the objection is practicable, please explain.
- b. Is any part of the proposal unclear or inconsistent in form? If so, please suggest alternative language.
- c. What, if any, does the commenter believe the fiscal impact of these rules will be?

2. On April 23, 2014, the Commission issued an Order which established the above stated case as a repository for documents and comments regarding Staff's proposal to consolidate and simplify the Commission's telecommunications rules and required that any comments shall be submitted no later than May 16, 2014.
3. On May 14, 2014, the Missouri Telecommunications Industry Association (MTIA) filed comments regarding Staff's proposal and suggested that the Commission hold a series of stakeholder workshops to provide the opportunity to further refine the Staff's proposal and discuss industry concerns and suggested revisions.
4. Public Counsel has had conversations with members of Staff to discuss Staff's proposed consolidation and simplification of the Commission's telecommunication rules. After these conversations, it is Public Counsel's understanding that Staff intends to hold workshops regarding its proposal in order to allow interested parties the opportunity to more thoroughly discuss the pertinent issues.
5. Public Counsel now states that it has no objection to Staff's request for a repository docket. Public Counsel fully supports holding workshops regarding Staff's proposal to consolidate and simplify the Commission's telecommunication rules and looks forward to receiving a more detailed explanation of Staff's proposed revisions.
6. Public Counsel intends to participate fully in the workshop process and will thus reserve comment on the questions posed by Staff in its Motion until after the workshops have been completed.

**WHEREFORE,** Public Counsel respectfully submits its Response.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

**/s/ Christina L. Baker**

By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 15<sup>th</sup> day of May 2014.

**Missouri Public Service Commission**

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**/s/ Christina L. Baker**

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