

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

In the Matter of the Lifeline and Link Up)
Tariff Revisions Required by the Federal) Case No. TT-2012-_____
Communications Commission.)

**MOTION FOR EXPEDITED TREATMENT AND
FOR APPROVAL OF TARIFF SHEETS ON LESS THAN THIRTY DAYS' NOTICE**

Comes now Green Hills Telecommunications Services (Company), and, in accordance with Missouri Public Service Commission (Commission) Rule 4 CSR 240-2.080(14), moves the Commission for expedited treatment of Company's proposed tariff sheets, filed on March 9, 2012:

1. On February 6, 2012, the Federal Communications Commission (FCC) released its *Report and Order and Further Notice of Proposed Rulemaking* in its Docket No. 11-42, *In the Matter of Lifeline and Line Up Reform and Modernization (Report and Order)*.

2. The FCC's changes to the Lifeline and Link Up programs include a reduction in the maximum amount of federal Lifeline support available from \$10.00 to \$9.25 and the elimination of the Link Up program to subsidize telephone connection charges. As a result, the Company's current intrastate tariffs must be revised to comply with the FCC's new mandates for the Lifeline and Link Up programs by April 2, 2012.

4. Concurrently with the filing of this Motion, Company filed tariff sheets in order to comply with the FCC Order.

5. As good cause for an expedited effective date and approval of the revised tariff sheets on less than thirty (30) days' notice, Company states that the FCC's *Report and Order* contains numerous provisions which substantially alter the federal Lifeline and Link Up programs on an expedited timeframe. The tariff sheets have been filed in compliance with the

FCC's *Report and Order*. Granting this Motion will allow Company to comply with the FCC's *Report and Order* in a timely manner.

6. The subject tariff sheets and this Motion have been filed as soon as possible after the receipt and review of the FCC's lengthy *Report and Order*. If the revised tariff sheets are not allowed to go into effect on April 2, 2012, the Company's tariff will not be in compliance with the FCC's new rules regarding Lifeline and Link Up and, as a practical matter, the Company will be required to provide Lifeline and Link Up subsidies to qualifying subscribers for which it will not be fully reimbursed by the Universal Service Administration Company (USAC).

7. Accordingly, Company seeks a Commission order allowing the proposed tariff sheets to go into effect for service rendered on and after April 2, 2012.

WHEREFORE, for the foregoing reasons, Company respectfully requests the Commission to grant this Motion for Expedited Treatment and approve Company's proposed tariff sheets effective on and after April 2, 2012.

Respectfully submitted

/s/ Brian McCartney

William R. England, III MBE#23975
Brian T. McCartney MBE#47788
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
Jefferson City, MO 65102-0456
Telephone: (573) 635-7166
Facsimile: (573) 635-0427
bmccartney@brydonlaw.com

ATTORNEYS FOR COMPANY

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 9th day of March, 2012, to PSC Staff and the Office of Public Counsel:

/s/ Brian McCartney