BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of an Investigation to Examine Call Routing and Call Completion Problems in the State of Missouri)))	File No. TO-2012-0104
In the Matter of an Investigation to Examine Call Routing and Call Completion Problems in the State of Missouri)	File No. IO-2012-0106

MOTION TO CONSOLIDATE INVESTIGATORY DOCKETS

Come now BPS Telephone Company, Citizens Telephone Company of Higginsville, Missouri, Craw-Kan Telephone Cooperative, Inc., Ellington Telephone Company, Fidelity Telephone Company, Granby Telephone Company, Grand River Mutual Telephone Corporation, Green Hills Telephone Corporation, Holway Telephone Company, Iamo Telephone Corporation, Kingdom Telephone Company, K.L.M. Telephone Company, Lathrop Telephone Company, Le-Ru Telephone Company, Mark Twain Rural Telephone Company, McDonald County Telephone Company, Miller Telephone Company, New Florence Telephone Company, New London Telephone Company, Northeast Missouri Rural Telephone Company, Orchard Farm Telephone Company, Oregon Farmers Mutual Telephone Company, Peace Valley Telephone Company, Inc., Rock Port Telephone Company, Steelville Telephone Exchange, Inc., and Stoutland Telephone Company (hereinafter collectively Applicants), pursuant to Missouri Public Service Commission (Commission) Rule 4 CSR 240-2.110(3), and for their Motion to Consolidate Case Nos. TO-2012-0104 and IO-2012-0106 state to the Commission as follows:

- 1. On October 5, 2011, a group of small rural telephone companies filed an application requesting that the Commission open an investigatory docket to examine call rating and call completion problems in the state of Missouri. The Case was docketed as File No. TO-2012-0104.
- 2. On October 6, 2011, Applicants filed a substantially similar application that was docketed as File No. IO-2012-0106. Applicants are also small rural telephone companies and are thus similarly-situated to the applicants in TO-2012-0104.
- 3. Commission Rule 4 CSR 240-2.110(3) allows the Commission to consolidate pending actions when those actions present "related questions of law and fact" and "to avoid unnecessary costs or delay."
- 4. The two applications are substantially similar and the applicants are similarly-situated, so the cases are expected to involve related questions of law and fact. It will serve the interest of administrative efficiency as well as conserve Commission resources to consolidate the two cases.
- 5. Applicants' counsel has been authorized to represent that: (a) counsel for the applicants in TO-2012-0104 consent to consolidation; and (b) counsel for the Commission does not oppose consolidation.

WHEREFORE, Applicants respectfully request that the Commission consolidate File Nos. TO-2012-0104 and IO-2012-0106 and grant such other relief as is reasonable under the circumstances.

¹ Alma Communications Company d/b/a Alma Telephone Company, Chariton Valley Telephone Corporation, Chariton Valley Telecom Corporation, Choctaw Telephone Company, Mid-Missouri Telephone Company, and MoKAN Dial, Inc.

Respectfully submitted,

/s/ Brian McCartney

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Attorneys for Applicants

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed, hand-delivered, or served electronically this 7th day of October, 2011 to:

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

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<u>/s/ Brian McCartney</u>

W. R. England, III/Brian T. McCartney