

## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Application for Approval of an Interconnection )  
Agreement between Green Hills Area Cellular, )  
Inc. and Alma Communication Company dba ) Docket No.  
Alma Telephone Pursuant to the )  
Telecommunications Act of 1996 )

### APPLICATION FOR APPROVAL OF AN INTERCONNECTION AGREEMENT AND REQUEST FOR WAIVER

COMES NOW, Green Hills Area Cellular, Inc. ("Green Hills") and files this  
Application for Approval of an Interconnection Agreement ("Agreement") between Green Hills  
and Alma Communication Company dba Alma Telephone ("Alma") pursuant to the  
Telecommunications Act of 1996 (the "Federal Act") and 20 CSR 4240-28.013(c). In support  
of its Application, Green Hills states the following:

#### **I. APPLICANT**

1. Green Hills is a Missouri corporation with offices at 7926 NE State Route M,  
Breckenridge, MO 64625. Green Hills is authorized to transact business within the State of  
Missouri and is authorized by the Missouri Public Service Commission ("Commission") to  
provide basic local telecommunications service within the state.

2. A certificate of good standing from the Missouri Secretary of State is attached hereto.

3. To Green Hills's knowledge, there are no overdue assessments or annual reports or  
final unsatisfied judgments or decisions against it involving customer service or rates occurring  
within the last three years.

#### **II. INTERCONNECTION AGREEMENT**

4. Green Hills presents to the Commission the attached Agreement for approval pursuant  
to the terms of the Federal Act. The implementation of the Agreement complies fully with  
Section 252(e) of the Act because the Agreement is consistent with the public interest,

convenience and necessity and does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers and increases customer choice for telecommunications services.

### **III. STANDARD OF REVIEW**

5. The statutory standard of review under Section 252(e) of the Federal Act states:

(e) Approval by State Commission.

(1) Approval Required. – Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission. A State commission to which an agreement is submitted shall approve or reject the agreement with written findings as to any deficiencies.

(2) Grounds For Rejection – The State commission may only reject –

(A) an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that –

(i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or

(ii) the implementation of such agreement or portion is not consistent with the public interest, convenience and necessity.

### **IV. REQUEST FOR APPROVAL**

6. Green Hills seeks the Commission's approval of the Agreement, consistent with the provisions of the Act. The Agreement is bilateral, reached as a result of negotiation and compromise between the parties. There are no outstanding issues involving the subject matter of the Agreement that require the assistance of mediation or arbitration.

7. Green Hills requests that the Commission grant expeditious approval of the Agreement, without change, suspension, or other delay in its implementation.

### **V. CONTACT INFORMATION**

8. In addition to undersigned counsel, all communications regarding this Application should

be addressed to the following representatives:

**Green Hills:**

David Adams, General Manager  
7926 NE State Route M  
Breckenridge, MO 64625  
660-644-5411  
dadams@ghhc.com

**Alma:**

Adolf Heins  
Alma Telephone Company  
102 W 3<sup>rd</sup> Street  
Alma, MO 64001  
660-674-2297  
aheins@almanet.net

**VI. CONCLUSION**

WHEREFORE, for the reasons set forth above, Green Hills respectfully requests that the Commission enter an Order approving this Interconnection Agreement between Green Hills and Alma.

Respectfully,

**/s/ Carl J. Lumley**

Carl J. Lumley #32869  
Curtis, Heinz, Garrett &  
O'Keefe, P.C.  
130 S. Bemiston, Suite 200  
St. Louis, MO 63105  
314-725-8788  
[clumley@chgolaw.com](mailto:clumley@chgolaw.com)

### **VERIFICATION AND REQUEST FOR WAIVER**

By signing this form, as General Manager of the Applicant I hereby verify the contents of the Application are true and correct to the best of my knowledge and belief and certify that neither I, nor any other members of this filing party, has had communications with a Commissioner, Commissioner Advisor, Regulatory Law Judge, or any member of their support team in the one hundred fifty (150) days prior to the filing date of this application regarding any substantive issue included in this filing. Accordingly, waiver of 20 CSR 4240-4.017(1)(D) is requested.



David Adams

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 9th day of September 2024, a copy of the above and foregoing Application for Approval of an Interconnection Agreement was served via email and/or U.S. Mail, postage prepaid, to each of the following:

**Office of the Public Counsel**

Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65101  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

**Office of the General Counsel**

Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65101  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

**Alma:**

Alma Telephone Company  
102 W 3<sup>rd</sup> Street  
Alma, MO 64001

**/s/ Carl J. Lumley**