

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:	:	
COMPLAINT OF	:	
CONCORD TELEPHONE EXCHANGE, INC.,	:	
HUMPHREYS COUNTY TELEPHONE,	:	
COMPANY, TELlico TELEPHONE	:	DOCKET NO. 11-00108
COMPANY, TENNESSEE TELEPHONE	:	
COMPANY, CROCKETT TELEPHONE	:	
COMPANY, INC., PEOPLES TELEPHONE	:	
COMPANY, WEST TENNESSEE	:	
TELEPHONE COMPANY, INC., NORTH	:	
CENTRAL TELEPHONE COOP., INC. AND	:	
HIGHLAND TELEPHONE COOPERATIVE,	:	
INC. AGAINST HALO WIRELESS,	:	
LLC, TRANSCOM ENHANCED SERVICES,	:	
INC AND OTHER AFFILIATES FOR	:	
FAILURE TO PAY TERMINATING	:	
INTRASTATE ACCESS CHARGES FOR	:	
TRAFFIC AND OTHER RELIEF AND	:	
AUTHORITY TO CEASE TERMINATION	:	
OF TRAFFIC	:	

**RESPONSE IN OPPOSITION TO MOTION TO RESCHEDULE FILED BY HALO
WIRELESS, LLC AND TRANSCOM ENHANCED SERVICES, INC.**

COMES NOW, Complainants, Concord Telephone Exchange, Inc., Humphreys County Telephone Company, Tellico Telephone Company and Tennessee Telephone Company; Crockett Telephone Company, Inc., Peoples Telephone Company, and West Tennessee Telephone Company, Inc.; Highland Telephone Cooperative, Inc.; and North Central Telephone Coop., Inc. (all collectively referred to as the "Rural Telephone Companies" or the "RLECs") in the above-styled docket, and file this Response in Opposition to the Motion to Reschedule filed by Halo Wireless, LLC ("Halo") and Transcom Enhanced Services, Inc. ("Transcom") (collectively, "Defendants"). On December 23, 2011, Halo and Transcom filed a Motion to Reschedule in the form of a letter to the Authority opposing the Procedural Schedule adopted by the Tennessee Regulatory Authority ("the TRA" or "the Authority"). However, while the schedule is brief, the

parties have enough time to comply with the Authority's schedule and the schedule promotes judicial economy and efficiency. Therefore, the Motion to Reschedule must be denied as forth below.

ARGUMENT

The RLECs appreciate and support the schedule set by the Chairman for various reasons, including the fact that RLECs' Complaint was filed over six (6) months ago and the delays associated with bringing the matter to hearings have been entirely the result of actions taken by Halo and Transcom.

The submission of testimony by Defendants will not be difficult for them. Defendants have previously filed state and federal court testimony on the subjects at issue in this case. Moreover, the factual issues almost entirely involve Defendants' *own* operations and objections to payment, subjects upon which they have written extensively already. If there is any hardship, it would be upon the RLECs who endorse the schedule.

In their letter, Halo and Transcom act as if the complaints filed by the RLECs and AT&T are entirely different and would require the preparation of completely different cases. The underlying facts, however, are basically the same and the RLECs expect the Defendant's testimony to be largely the same, if not identical. There is no need, therefore, for any additional time for Defendants to prepare their witnesses' testimony.

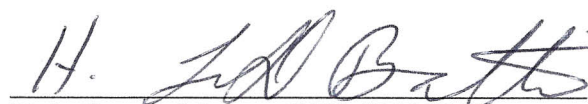
Holding the hearing back to back with the AT&T case (Docket # 11-00119) serves judicial economy and efficiency. The schedule also addresses the Defendants' prior complaints about conflicting schedules in multiple jurisdictions. If counsel for Halo and Transcom are able to attend hearing before the Authority on January 17, 2012, they should also be able to stay over to attend on January 18, 2012.

CONCLUSION

The RLECs support the schedule as ordered and object to the self-serving delay sought by Defendants. The schedule promotes judicial economy and efficiency and does not prejudice the parties. Therefore, the Motion to Reschedule filed by Defendants must be denied.

This 27th day of December, 2011.

Respectfully submitted,



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Attorneys for Complainants

CERTIFICATE OF SERVICE


I certify that I have this day served a copy of the foregoing REPLY upon the following persons by causing electronic copies of the same to be transmitted to each interested party that has supplied a valid email address, and all other parties to be served via first class mail with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

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This 27th day of December, 2011.


H. LaDon Baltimore