

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Received
on
APR 06 2012
by
State Corporation Commission
of Kansas

In the Matter of the Application of Lifeline)
Phone Service, Inc. for a Certificate of)
Convenience and Authority to Provide) Docket No. 12-LLPT-714-COC
Local Exchange Telecommunications)
Service on a Resold Basis Within the State)
of Kansas.)

**RESPONSE OF STAFF TO MOTION FOR EXPEDITED ADJUDICATION OF
APPLICATION FOR CERTIFICATE OF CONVENIENCE AND AUTHORITY**

COMES NOW Staff ("Staff") of the State Corporation Commission of the State of Kansas ("Commission") and hereby responds to the Motion for Expedited Adjudication of Application for Certificate of Convenience and Authority filed by Lifeline Phone Service, Inc. ("LPS"). In response to said pleading, Staff states as follows:

1. On March 23, 2012, LPS filed an Application for a Certificate of Convenience and Authority to provide resold local exchange service.

2. On April 5, 2012, LPS filed its Motion in which it states its Application should be expedited to protect customers from losing telephone services because it was informed that the Commission may "suspend" Connect Insured Telephone, Inc. d/b/a Connect IT's ("Connect IT") Certificate of Convenience and Authority, leaving approximately 2,000 customers without service. This is incorrect. The Commission has not taken any action to "suspend" Connect IT's Certificate.

3. Moreover, the Commission adopted procedures in Docket No. 01-GIMT-649-GIT to help protect consumers from loss of service if and when a carrier stops operating in the state. The procedures were adopted by the Commission in 2002, submitted to the Kansas Secretary of

State's Office to be published in the January 9, 2003 edition of the Kansas Register. The regulations, K.A.R. 82-13-1 and K.A.R. 82-13-2 became effective on January 24, 2003.

4. Movant's request should be denied.

WHEREFORE, Staff respectfully requests the Commission deny the Movant's request for expedited treatment of its Application.

Respectfully submitted,



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CERTIFICATE OF SERVICE

12-LLPT-714-COC

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Response of Staff to Motion for Expedited Adjudication of Application for Certificate of Convenience and Authority was placed in the United States mail, postage prepaid, or hand-delivered this 6th day of April, 2012, to the following:

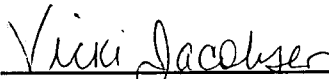
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