

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

In the matter of the request from the customers)
in the Rockaway Beach exchange for an expanded) Case No. TO-2003-0257
calling scope to make toll free calls to Branson.)

JOINT MOTION FOR STAY OF PROCEEDINGS

COME NOW the Office of the Public Counsel (“Public Counsel”) and CenturyTel of Missouri, LLC (“CenturyTel”) (collectively referred to as “Joint Movants”) and for their Joint Motion for Stay of Proceedings respectfully state as follows:

1. On January 29, 2003, Public Counsel filed Office Of The Public Counsel’s Petitions On Behalf Of Customers In The Rockaway Beach Exchange For An Expanded Toll-Free Calling Scope To Branson (“Petition”) with the Commission, said matter being designated Case No. TO-2003-0257. As set forth in the Petition, Public Counsel alleges that it “files petitions signed by the majority of the telephone customers of CenturyTel’s Rockaway Beach exchange (NXX 561-0000) requesting that the customers of that exchange have toll-free calling into Branson because of the close community of interest of the customers to the Branson exchange.” In addition, Public Counsel asserts:

Prior to the termination of Community Optional Service in Case No. TW-98-333, this exchange was the petitioning exchange for COS service to the Branson target exchange. The customers believe that a suitable replacement for that service has not been provided and now seek relief from CenturyTel, the new operator of the exchanges at issue, and from the Public Service Commission of Missouri. (Petition at 1.)

2. Pursuant to the Commission's *Report and Order* issued in Case No. TM-2002-232, CenturyTel provides basic local and interexchange telecommunications services in Missouri.¹

3. In its Petition, Public Counsel requests the following relief:

Public Counsel asks the Commission to (1) accept these customer petitions, (2) open a case and give notice to the company, local government agencies, the industry, customers and the public in general of this request, (3) hold public hearings and seek public comments and (4) consider whether the requested expanded calling scope is feasible and whether it is in the public interest and can be provided at just, reasonable, and affordable rates. (Petition at 2.)

4. To date, the Commission has not taken any formal action in response to the Petition (i.e., open a case, give notice to the company, etc.), and by joining in this Motion, CenturyTel does not waive its rights to respond to the Petition upon receipt of notice, to raise objections and to file future motions should the Commission ultimately open a case and provide formal notice, nor does CenturyTel make any statements or allegations concerning the propriety of the Petition or the relief requested therein.

5. CenturyTel has advised Public Counsel that representatives of CenturyTel will be holding a meeting in the near future with representatives of several communities surrounding Branson, including Rockaway Beach, to discuss these issues and to communicate the company's plans relative to the subject concerns.

¹ *In the Matter of the Joint Application of GTE Midwest, Inc., d/b/a Verizon Midwest and CenturyTel of Missouri, LLC for 1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities and System Located in the State of Missouri; 2) For Issuance of Certificate of Service Authority to CenturyTel of Missouri, LLC; 3) To Designate CenturyTel of Missouri, LLC as Subject to Regulation as a Price Cap Company; and 4) To Designate CenturyTel of Missouri, LLC as a Telecommunications Carrier Eligible to Receive Federal Universal Service Support.*

6. Based upon CenturyTel's representations to Public Counsel as set forth in Paragraph 5 above, Public Counsel has agreed to join with the Company to request that the Commission defer any action on the petition for sixty days.

7. Accordingly, in the interests of judicial efficiency and in order to allow CenturyTel the opportunity to address these issues on an informal basis, Public Counsel and CenturyTel respectfully request that the Commission defer any action in response to Public Counsel's petition for a period of sixty (60) days from this date.

WHEREFORE, the Office of the Public Counsel and CenturyTel of Missouri, LLC respectfully move the Commission to issue an Order in this matter staying any action for a period of sixty (60) days from the date hereof.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:



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And

CENTURYTEL OF MISSOURI, LLC

By:



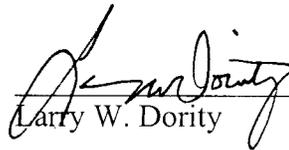
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 21~~st~~ day of February, 2003, to:

Dana K. Joyce
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City MO 65102


Larry W. Dority