
LAW OFFICES

PAYNE & JONES

CHARTERED

COLLEGE BOULEVARD AT KING
11000 KING
P. O. BOX 25625
OVERLAND PARK, KS 66225-5625
(913) 469-4100
TELECOPIER: (913) 469-8182

3145 BROADWAY
KANSAS CITY, MO 64111
(816) 960-3600

THOMAS K. JONES
TJONES@PAYNEJONES.COM

October 6, 2005

Transmitted Via Fed Ex

Ms. Culley Dale
Missouri Public Service Commission
200 Madison Ave., Suite 100
Jefferson City, MO 65101

FILED³

OCT 07 2005

Missouri Public
Service Commission

Dear Ms. Dale:

Ironhorse Services, LLC hereby submits a statement in response to the Commission's order dated September 30, 2005 in case LA-2006-0067 concerning its intention to offer basic local service as a distinct and separate service. Please call David E. Scott (816) 786-0818 or me with any further questions.

Sincerely,



Thomas K. Jones
for Payne & Jones, Chtd.

TKJ/als

cc: Ironhorse Services, LLC

FILED³

OCT 07 2005

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)
Ironhorse, LLC for a Certificate of Service)
Authority to Provide Basic Local, Local and)
Interexchange Voice Service in)
Portions of the State of Missouri and to Classify)
said Services and the Company as Competitive)

Case No. LA 2006-0067 _____

STATEMENT

Comes now Ironhorse, LLC ("Ironhorse"), d/b/a Ironhorse, by its undersigned counsel, and hereby submits the following Statement.

1. On September 30, 2005, the Commission issued an order directing the Staff to file a pleading no later than October 7, 2005 identifying where in Ironhorse's pleadings the company had stated that it will provide basic local service as a separate and distinct service, or that if no affirmative statement had been made in the company's pleadings that the company shall file such a statement.


2. In its response to the directive order Staff noted two representations in the filings that led to the conclusion that the services provided will be separate and distinct, but that these words do not appear in the Applicant's Application, and therefore concurs in the Commission's direction to have the Applicant file an affirmative statement that the Applicant will provide basic local service as a separate and distinct service

3. In its review of the Application, Staff noted two representations in the filing that led to the conclusion that the services provided will be separate and distinct. However, these words do not appear in the Applicant's Application. Accordingly, Staff concurs in the Commission's direction to have the Applicant file an affirmative statement that the Applicant will provide basic

local service as a separate and distinct service.

4. Therefore, as ordered by the Commission, Ironhorse Services, LLC. herewith states that it will offer basic local service as a separate and distinct service.

Respectfully submitted,

By 
Thomas K. Jones MO #25577
Payne & Jones, Chartered
11000 King
PO Box 25625
Overland Park, KS 66225-5625
Telephone: (913) 469-4100
FAX: (913) 469-8182
Email: tjones@paynejones.com

*Attorneys for Applicant Ironhorse Services,
LLC*