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June 3, 2002

Mr Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
P O Box 360  
Jefferson City, Missouri 65102-0360

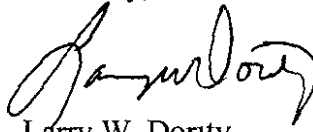
RE *Kanakuk Kamps, Inc v GTE Midwest Incorporated d/b/a Verizon Midwest,*  
*Case No TC-2002-493, Case No XC-2002-1054*

Dear Mr Roberts

**Enclosed for filing in the above-referenced matter are the original and eight (8) copies of Motion for Reconsideration of Respondent Venzon Midwest A copy of the foregoing Motion has been hand-delivered or mailed this date to each party of record**

**Thank you** for your attention to this matter

Sincerely,



Larry W DORITY

Enclosures

cc Dana K Joyce, General Counsel  
Mike Dandmo, Office of the Public Counsel  
Charles J Fain

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Kanakuk Kamps, Inc ,	)	
Complainant,	)	
v	)	Case No <del>TC-2002-493</del>
		Case No XC-2002-1054
GTE Midwest Incorporated	)	
d/b/a Venzon Midwest,	)	
Respondent	)	

MOTION FOR RECONSIDERATION  
OF RESPONDENT VERIZON MIDWEST

COMES NOW Respondent, GTE Midwest Incorporated d/b/a Venzon Midwest ("Verizon"), pursuant to Commission Rule 4 CSR 240-2 160(2), and respectfully moves the Commission to reconsider its Order Setting Prehearing Conference And Requiring Filing Of Procedural Schedule issued in this matter on May 24, 2002 ("May 24<sup>th</sup> Order") In support of its Motion, Verizon states as follows

1 As set forth in its Motion to Dismiss, Answer and Affirmative Defenses filed on May 23, 2002, Venzon stated that, prior to the filing of this Complaint, Venzon had filed an Application And Motion For Expedited Treatment before the Commission in Case No TO-2002-481, that was intended to resolve this matter In its Application, Verizon requested that the Commission overturn the North American Numbering Plan Administrator's (NANPA) previous determination to deny Verizon the numbering resources necessary to meet the needs of Kanakuk Kamps On April 26, 2002, the Staff filed its Staff

Recommendation in Case No TO-2002-481, in which Staff "recommends that the Commission enter an Order approving the request for additional numbering resources, subject to the requirement that the Commission Order Verizon to assign the additional telephone numbers *sequentially* pursuant to the requirements of the Code of Federal Regulations " That matter is now ripe for decision by the Commission In the event that the Commission grants Verizon's Application in Case No TO-2002-481, then the Complaint filed herein should be resolved following the release of the numbering resources by NANPA

2 In its May 24<sup>th</sup> Order, the Commission finds that "[t]his matter is now at issue and a prehearing conference and procedural schedule are appropriate to ensure its prompt resolution " Verizon appreciates the Commission's desire to achieve a prompt resolution of this matter, however, as noted in Paragraph 1, *supra*, the subject matter of this complaint is ripe for resolution by Commission action in Case No TO-2002-481 Accordingly, Verizon would respectfully suggest that the portions of the May 24<sup>th</sup> Order setting a Prehearing Conference for June 12 and the resulting requirement of filing a proposed procedural schedule on June 19, may be premature and, therefore, unreasonable (4 CSR 240-2 160(2))

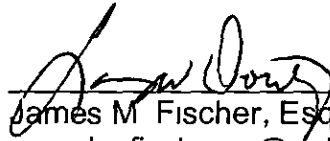
3 In the interests of judicial efficiency for the Commission, and an attempt to minimize the parties' time and expenses incurred in this matter, Verizon requests the Commission to reconsider its May 24<sup>th</sup> Order by staying or postponing both the Prehearing Conference and the requirement for filing a proposed procedural schedule in this matter, pending the Commission's

resolution of these issues in Case No TO-2002-481 As previously stated, Commission action in Case No TO-2002-481 may well render the instant Complaint moot

4 The undersigned counsel is authorized to represent to the Commission that he has contacted counsel for Petitioner, Mr Charles J Fain, Esq , and that Petitioner does not object to the relief requested **herein**

**WHEREFORE,** Respondent Venzon Midwest respectfully moves the Commission to reconsider its procedural May 24<sup>th</sup> Order and grant the relief specifically requested herein

Respectfully submitted,



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Attorneys for GTE Midwest Incorporated  
d/b/a Venzon Midwest


## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 3<sup>rd</sup> day of June, 2002, to

Charles J Fain  
P O Box 434  
Forsyth, MO 65653

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General Counsel  
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