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April 25, 1997

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

**RE: Case No. TW-97-333 -In the matter of an Investigation into the Provision of
Community Optional Calling Service in Missouri**

Dear Mr. Wright:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed
copies of **Motion to Delay Procedural Schedule**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Cherlyn D. McGowan
Assistant General Counsel
573-751-3966
573-751-9285 (Fax)

CDM/clw
Enclosure
cc: Counsel of Record

FILED
APR 25 1997
MISSOURI
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
APR 25 1997
MISSOURI
PUBLIC SERVICE COMMISSION

In the Matter of an Investigation into the)
Provision of Community Optional Calling)
Service in Missouri)

Case No. TW-97-333

MOTION TO DELAY PROCEDURAL SCHEDULE

Comes now the Staff of the Missouri Public Service Commission by and through its Office of the General Counsel and for its Motion to Delay Procedural Schedule respectfully states as follows:

1. On March 7, 1997, the Commission issued its Order Establishing Docket in this case. In that order the Commission adopted an abbreviated procedural schedule.
2. In Compliance with the adopted procedural schedule the parties filed direct testimony on April 11, 1997. This filing included the direct testimony of Bob Schoonmaker filed on behalf of the Small Telephone Company Group (Small TCG). Attached to Mr. Schoonmaker's direct testimony was Schedule RCS-2 which was marked highly confidential and contained information relating to the number of business and residential community optional service (COS) lines in service for various exchanges as well as the number of COS minutes used back and forth between the petitioned and targeted exchanges.
3. Based upon its review of the numbers contained in Mr. Schoonmaker's highly confidential Schedule RCS-2, the Staff believes that there may be a problem with the factual data or there may be inappropriate use of COS, because of the unexpectedly high minutes of use from the

target exchange back to the petitioning exchange on some COS routes. In an attempt to clarify the these numerical anomalies the Staff sent several follow-up data requests (DRs) to the Small TCG. It is important that the reasons for this unexpected data be investigated so that the best information possible can be submitted to the Commission for consideration.

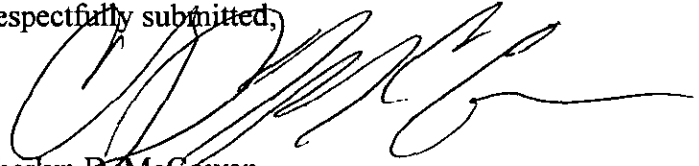
4. Prior to its review of the direct testimony filed in this docket, the Staff believed this was a routine case with one basic issue. That was to determine the future of COS in the increasingly competitive local telecommunications arena. However , with the filing of direct testimony it became apparent that this case was neither routine nor single issue.

5. Due to the numerical anomalies in issue the Staff believes a one month delay in the existing procedural schedule is appropriate and necessary to allow the Staff and the other parties to this docket time to conduct additional discovery and an adequate review of the numerical anomalies to determine whether or not the problem involves factual data or inappropriate use of COS. An approximate one month delay in the current procedural schedule including necessary adjustments to accommodate the Commission's calendar would modify the procedural schedule as follows:

Rebuttal Testimony filed by All Parties	June 2, 1997
Issues Memorandum file by the Staff	June 6, 1997
Hearings	June 25-26, 1997

WHEREFORE, while the Staff respectfully requests that the procedural schedule adopted in this docket be delayed approximately one month to allow the parties adequate time to address the new issues that surfaced based upon Mr. Schoonmaker's direct testimony.

Respectfully submitted,

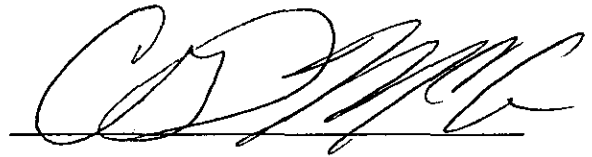


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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 25th day of April, 1997.



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Revised: April 25, 1997

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