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November 21, 2000

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public service Commission P.O. Box 360 Jefferson City, MO 65102 FILE: D<sup>3</sup>
NOV 2 1 2000

Missouri Public Service Commission

Re: FairPoint Communications Solutions Corp Case No. TA-2000-514

Dear Mr. Roberts:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU SONDRA B. MORGAN CHARLES E. SMARR

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND. III

JOHNNY K. RICHARDSON

Enclosed please find the original plus eight (8) copies of Second Motion to Suspend Procedural Schedule for filing on behalf of FairPoint Communications Solutions Corp. in the above referenced matter. Please bring this matter to the attention of the appropriate Commission personnel. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Sondra B. Morgan

Soudia Morgan

SBM/lar Enclosures

cc: Office of Public Counsel

Nathan Williams Mimi McDonald Michael Kent

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



Missouri Public Service Commission

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)	Case No. TA-2000-514
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## SECOND MOTION TO SUSPEND PROCEDURAL SCHEDULE

Comes now FairPoint Communications Solutions Corp. ("FairPoint" or "Applicant"), f/k/a FairPoint Communications Corp., and in support of its Second Motion to Suspend Procedural Schedule states to the Missouri Public Service Commission ("Commission") as follows:

- 1. On February 22, 2000, Applicant filed an application with the Commission requesting authority to provide basic local telecommunications service in portions of the State of Missouri. At the time the application was filed, Applicant's name was FairPoint Communications Corp.
- 2. On November 15, 2000, FairPoint filed a Motion to Suspend Procedural Schedule requesting that the schedule be suspended for one week in order to give the company time to file additional financial information with the Commission. On November 17, 2000, the Commission issued its Order Granting Additional Time to File Direct Testimony granting FairPoint to November 27, 2000, to file direct testimony.
- 3. Because the Commission Staff has requested additional financial information which will take some time to obtain from the company, FairPoint finds it necessary to request

that the procedural schedule be further suspended in order to give the company time to forward the information to Staff and for the Staff to complete its review. FairPoint therefore requests that the Commission further suspend the procedural schedule so that the company's direct testimony would not be due until December 14, 2000. The other parties to this case have been contacted and have no objection to this request.

WHEREFORE, Applicant respectfully requests that the Commission grant its Second Motion to Suspend Procedural Schedule and grant FairPoint an extension of time up to December 14, 2000, to file direct testimony as well as granting such further relief as the Commission deems appropriate.

Respectfully submitted,

Sondra B. Morgan

Mo. #35482

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Attorneys for FairPoint Communications Solutions Corp. f/k/a FairPoint Communications Corp.

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was delivered, via U.S. Mail, and/or hand-delivered this 2/4 day of November, 2000, to:

Michael Dandino Office of Public Counsel 200 Madison, Suite 650 P.O. Box 7800 Jefferson City, MO 65102

Mimi McDonald Southwestern Bell Telephone Company One Bell Center, Room 3510 St. Louis, MO 63101 Nathan Williams Missouri Public Service Commission 200 Madison Street P.O. Box 360 Jefferson City, MO 65102

Sondra B. Morgan