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November 15, 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

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

FILED³
NOV 15 2000
Missouri Public
Service Commission

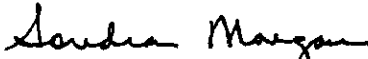
Dear Mr. Roberts:

Enclosed please find the original plus eight (8) copies of Motion to Suspend Procedural Schedule for filing on behalf of FairPoint Communications Solutions Corp, formerly FairPoint Communications 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.

Very truly yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: 
Sondra B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel
Nathan Williams
Mimi McDonald
FairPoint Communications

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
NOV 15 2000

Missouri Public
Service Commission

In the Matter of the Application of)
FairPoint Communications Corp. for)
a Certificate of Service Authority to)
provide Basic Local Telecommunications)
Service in portions of the State of Missouri)
and to classify said services and)
the company as competitive.)

Case No. TA-2000-514

MOTION TO SUSPEND PROCEDURAL SCHEDULE

Comes now FairPoint Communications Solutions Corp. ("FairPoint"), formerly FairPoint Communications Corp., and for its Motion to Suspend Procedural Schedule states to the Missouri Public Service Commission ("Commission") as follows:

1. On February 22, 2000, FairPoint filed an application requesting a certificate of authority to provide basic local telecommunications service in the State of Missouri.
2. On March 8, Southwestern Bell Telephone Company ("SWBT") filed an Application to Intervene, and on April 4, 2000, the Commission issued its Order Granting Intervention, Setting a Prehearing Conference and Directing Filing of Procedural Schedule in which it granted SWBT's Application to Intervene, set an early prehearing conference and directed that the parties file a procedural schedule.
3. On March 2, 2000, FairPoint received a letter from the Telecommunications Department of the Commission stating that FairPoint's application did not meet certain financial tests. After discussions with Staff, FairPoint decided to post a surety bond as proof of financial ability in compliance with the Commission's new rule 4 CSR 240-32.110 effective April 30, 2000. FairPoint did, in fact, procure a bond, but before it could be filed with the Commission, the Commission moved to rescind its rule. FairPoint's attempts to comply with the subsequent

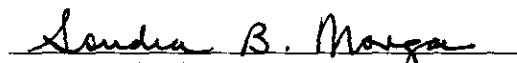
revised surety bond rule were also unsuccessful, and it is the company's understanding that that rule will also be rescinded.

4. On July 25, 2000, the Commission issued its Order Adopting Procedural Schedule in which it, among other things, directed that FairPoint file Direct Testimony by 3:00 p.m. on November 16, 2000.

5. After discussions with counsel for the other parties to the case, FairPoint and the other parties have agreed to enter into a Unanimous Stipulation and Agreement to resolve this case pending the submission and review of certain financial information. FairPoint intends to submit this revised and updated financial information on this same date. In order to give the Staff time to review this information, FairPoint requests that the procedural schedule requiring that direct testimony be filed on November 16 be suspended for one week in order to give the parties time to complete and file the Unanimous Stipulation and Agreement. All parties to this case have been contacted and have no objections to this request. FairPoint hopes to be able to file a Unanimous Stipulation and Agreement which will obviate the need for a procedural schedule.

Wherefore, FairPoint respectfully requests that the Commission grant its Motion to Suspend Procedural Schedule and for any other relief appropriate in the circumstances.

Respectfully submitted,



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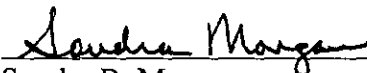
Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, postage prepaid, or hand-delivered this 15th day of November, 2000, to:

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