

FILED

SEP 15 1999

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

Missouri Public
Service Commission

**In the Matter of Alma Telephone
Company's Filing to Revise it's Access
Service Tariff, PSC Mo. No. 2**

)
)
)

Case No. TT-99-428, et al

**MID-MISSOURI GROUP MOTION TO COMPEL ANSWERS TO
DATA REQUESTS FROM SOUTHWESTERN BELL WIRELESS**


COMES NOW the Mid-Missouri Group and hereby moves to Compel Answers to data requests submitted by the Mid-Missouri Group to Southwestern Bell Wireless and in support hereof states the following:

1. On July 28, 1999, the Mid-Missouri Group served data request on SWB Wireless, a copy of which are attached hereto and incorporated by reference as Appendix 1.
2. Over twenty (20) days have elapsed from the date of service of the data requests, and to date the Mid-Missouri Group has received no Answers, Objections, or any Responses whatsoever to the data requests submitted.
3. SWB Wireless applied and was allowed to intervene as a party in this preceding, and as such has an obligation to produce the data requested.
4. All of the data requested is relevant, pertinent, and material to the issues in this docket.

WHEREFORE, the basis of the foregoing, the Mid-Missouri Group respectfully requests that the Commission issue an order directing SWB Wireless to provide Answers to these data requests to the Mid-Missouri Group counsel no later than September 30, 1999, which will be a minimum time to allow incorporation of the Responses into surrebuttal testimony due from the Mid-Missouri Group on October 4th.

ANDERECK, EVANS, MILNE
PEACE & BAUMHOER

By




Craig S. Johnson
MO Bar # 28179
Hawthorn Bldg. - 3rd Floor
305 East McCarty Street
P.O. Box 1438
Jefferson City, MO 65102
Telephone: 573/634-3422
Facsimile: 573/634-7822

ATTORNEYS FOR MID-MISSOURI GROUP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, U. S. Mail, postage pre-paid, this 15th day of September, 1999, to all attorneys of record.



Craig S. Johnson

ANDERHECK, EVANS, MILNE, PEACE & BAUMHOER

ATTORNEYS AT LAW

305 EAST McCARTY STREET

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438

TELEPHONE 573-634-3422

FAX 573-634-7822

EUGENE E. ANDERHECK

TERRY M. EVANS

ERWIN L. MILNE

JACK PEACE

PATRICK A. BAUMHOER

CRAIG S. JOHNSON

RODRIC A. WIDGER

GEORGE M. JOHNSON

BEVERLY J. FIGG

WILLIAM S. LEWIS

VICTOR S. SCOTT

LESLEY A. RENFRO

COREY K. HERRON

MATTHEW M. KROHN

LANETTE R. GOOCH

MATTHEW D. TURNER

LORI A. KOWALSKI

MARVIN L. SHARP

OF COUNSEL

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

July 28, 1999

Ms. Jeanne Fischer
Attorney at Law
13075 Manchester, 1st Floor
St. Louis, MO 63131

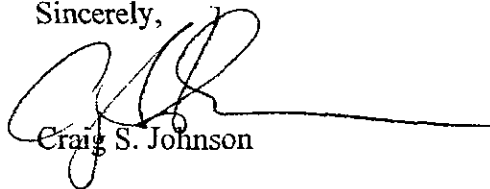
RE: Consolidated Case Nos. TT-99-428, TT-99-429, TT-99-430, TT-99-431,
TT-99-432, and TT_99-433

Dear Ms. Fischer:

Please find enclosed 5 data requests on behalf of the Mid-Missouri Group.

Thank you.

Sincerely,



Craig S. Johnson

CSJ/krm/Enc.

TRENTON OFFICE
9th AND WASHINGTON
P.O. BOX 547
TRENTON, MISSOURI 64683-0547
660-359-2244
FAX 660-359-2116

SPRINGFIELD OFFICE
1111 S. GLENSTONE
P.O. BOX 4929
SPRINGFIELD, MISSOURI 65808-4929
417-864-6401
FAX 417-864-4967

PRINCETON OFFICE
207 NORTH WASHINGTON
PRINCETON, MISSOURI 64673
660-748-2244
FAX 660-748-4405

SMITHVILLE OFFICE
119 E. MAIN STREET
P.O. BOX 654
SMITHVILLE, MISSOURI 64089
816-532-3895
FAX 816-532-3899

APPENDIX 1

23

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP
DATA REQUEST NO. 1

Requested from: SWB Wireless

Date Requested: July 28, 1999

Has your company ever originated, transported, handed off, or delivered telecommunications traffic destined to be terminated in any of the Missouri exchanges of any of the following companies?

Alltel Communications Inc
Alma Telephone Co.
BPS Telephone Co.
Cass County Telephone Co.
Chariton Valley Telephone Corp.
Choctaw Telephone Co.
Citizens Telephone Co.
Craw-Kan Telephone Coop
Ellington Telephone Co.
Farber Telephone Co.
Goodman Telephone Co.
Granby Telephone Co.
Grand River Mutual Telephone Corp.
Green Hill Telephone Corp.
Holway Telephone Co.
Iamo Telephone Co.
Kingdom Telephone Co.
KLM Telephone Co.
Lathrop Telephone Co.

Le-Ru Telephone Co.
Mark Twain Telephone Co.
McDonald County Telephone Co.
Mid-Missouri Telephone Co.
Miller Telephone Co.
Modern Telecommunications Co.
MoKan Dial, Inc.
New Florence Telephone Co.
New London Telephone Co.
Northeast Missouri Rural Telephone Co.
Orchard Farms Telephone Co.
Oregon Farmers Mutual Telephone Co.
Ozark Telephone Co.
Peace Valley Telephone Co.
Rock Port Telephone Co.
Seneca Telephone Co.
Steelville Telephone Exchange, Inc.
Stoutland Telephone Co.

Requested by: Craig S. Johnson

Information Provided:

Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: _____

Signed By: _____

Prepared By: _____

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP
DATA REQUEST NO. 2

Requested from: SWB Wireless

Date Requested: July 28, 1999

If your answer to DR 1 was in the affirmative, please list the amount of such traffic by year for the years 1990 – 1997 destined for each of the companies listed in DR 1.

Requested by: Craig S. Johnson

Information Provided:

Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: _____

Signed By: _____

Prepared By: _____

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP
DATA REQUEST NO. 3

Requested from: SWB Wireless

Date Requested: July 28, 1999

If your answer to DR 1 was in the affirmative, please list the amount of such traffic by month between January of 1998 and July of 1999 destined for each of the companies listed in DR 1.

Requested by: Craig S. Johnson

Information Provided:

Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: _____

Signed By: _____

Prepared By: _____

MID-MISSOURI GROUP
DATA REQUEST NO. 4

Requested from: SWB Wireless

Date Requested: July 28, 1999

If your answer to DR 1 was in the affirmative, please list the following information for all such traffic since 1990:

- a. whether the traffic originated on a commercial mobile radio or wireless phone
- b. whether both the origination and termination point were within the same MTA
- c. whether the traffic was terminated to the companies listed in DR 1 by you over a direct physical interconnection with that company
- d. the identity of the company or companies that you handed off or delivered the traffic to for transport, transiting, switching, and/or termination
- e. whether the traffic was handed off or delivered to the company or companies identified in subpart d above pursuant to a tariff or pursuant to an interconnection agreement
- f. whether you have paid intercompany compensation for the termination of such traffic terminated on the facilities of the companies listed in DR 1
- g. to whom you made the payment or payments indicated in your answer to subpart f above

Requested by: Craig S. Johnson

Information Provided:

Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: _____

Signed By: _____

Prepared By: _____

CASE NOS. TT-99-428, TT-99-429, TT-99-430, TT-99-431, TT-99-432, TT-99-433

MID-MISSOURI GROUP
DATA REQUEST NO. 5

Requested from: SWB Wireless

Date Requested: July 28, 1999

Have you destroyed or not retained any records or data from which the information requested in preceding data requests 1 through 4 could have been obtained? If so, please state the dates such records or data were destroyed or not retained and the inclusive dates such destroyed or non-retained data would have included.

Requested by: Craig S. Johnson

Information Provided:

Mid-Missouri Group request the above data/information pursuant to Rule 4 C.S.R. 240-2.090.

The information provided to Mid-Missouri Group in response to the above data request is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned. The undersigned agrees to immediately inform Mid-Missouri Group if any matters are discovered which would materially affect the accuracy or completeness of the information provided in response to the above information.

Date Response Received: _____

Signed By: _____

Prepared By: _____