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JEFFERSON CITY, MISSOURI 65102
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573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>
October 25, 2000

BRIAN D. KINKADE
Executive Director

GORDON L. PERSINGER
Director, Research and Public Affairs

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Director, Utility Operations

ROBERT SCHALLENBERG
Director, Utility Services

DONNA M. KOLILIS
Director, Administration

DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE
General Counsel

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

FILED²

OCT 25 2000

RE: Case No. TT-2001-117

Missouri Public
Service Commission

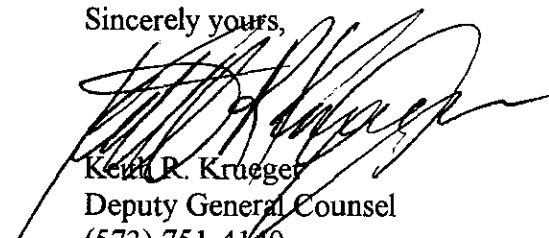
Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO COMPEL DISCOVERY**.

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,



Kent R. Krueger
Deputy General Counsel
(573) 751-4140
(573) 751-9285 (Fax)

KRK/dkf
Enclosure
cc: Counsel of Record

5

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Access Tariff Filing of)
Ozark Telephone Company.)

Case No. TT-2001-117
Tariff File No. 200100203

FILED²
OCT 25 2000
Missouri Public
Service Commission

MOTION TO COMPEL DISCOVERY

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), pursuant to 4 CSR 240-2.090, and for its Motion to Compel Discovery, states to the Missouri Public Service Commission ("Commission") as follows:

1. On August 23, 2000, Ozark Telephone Company ("Ozark" or "Company") submitted to the Commission a tariff sheet designed to make permanent the interim revenue surcharge that it implemented pursuant to Reports and Orders issued in Case Nos. TO-99-519 and TO-99-254. The tariff sheet bore a proposed effective date of October 1, 2000.

2. On August 31, 2000, the Commission issued an Order Rejecting Tariffs and Denying Motion for Protective Order, which rejected the proposed tariff sheet.

3. On September 11, 2000, the Company filed a Motion For Reconsideration, Or In The Alternative, Application For Rehearing.

4. On September 21, 2000, the Commission issued an Order Granting Reconsideration, Suspending Tariff, Directing Notice, Directing Filing, Scheduling Prehearing Conference, And Establishing Protective Order, which granted the Company's motion for reconsideration, vacated the Commission's August 31 Order, and suspended the proposed tariff sheet for a period of 150 days from the proposed effective date to allow sufficient time to study the effect of the proposed tariff and to determine if it is just, reasonable and in the public interest.

5. Pursuant to the Commission's September 21 Order, the Company, on September 25, 2000, filed "Proprietary" financial and business information regarding the Company's revenues and earnings.

6. On September 28, 2000, the Staff presented 52 data requests to the Company. All 52 of those data requests are the subject of this motion and are attached hereto as Appendix A.

7. Pursuant to 4 CSR 240-2.090 (2), the party to whom data requests are presented shall answer the requests within 20 days after receipt unless otherwise agreed by the parties to the data request. Therefore, in the absence of an agreement, the answers to the data requests were due on or before October 18, 2000.

8. Pursuant to 4 CSR 240-2.090(2), the Company on October 6, 2000, sent to the Staff a letter which objected to certain of the data requests, and which also stated that the Company is unable to timely answer the data requests but that it expects to have all of the remaining data requests answered within 40 days or by November 7, 2000. The Company's letter is attached as Appendix B.

9. Pursuant to 4 CSR 240-2.090(8)(A), Staff counsel and Company counsel conferred by telephone on October 13, 2000, in a good faith effort to address the Company's objections and its proposal to extend the due date for answering the data requests. The parties were able to reach a resolution only as to the Company's objection to Data Request No. 26.

10. Pursuant to 4 CSR 240-2.090(8)(B), Staff counsel and Company counsel discussed this discovery dispute in a telephone conference with the Commission's regulatory law judge on October 18, 2000, but were not able to further resolve this discovery dispute beyond clarifying the wording of Data Request No. 42.

11. The Company has objected to Data Requests No. 22, 34, 35, 36, 39, 42 and 48. The Company's letter states that "the Company objects to these requests, insofar as they seek information prior to 1999, as they are overbroad and burdensome and not relevant to the instant proceeding (nor are they likely to lead to the discovery of relevant information). The Company will provide information for 1999 and the current year."

12. a. Data Request No. 22 asks: "Please provide overtime hours and dollars by month by employee for the previous 5 years and the current year to date."

b. Data Request No. 34 asks: "Please provide the amounts of all Liability Insurance pay-outs per accident for the Company for the last 5 years and the current year to date."

c. Data Request No. 35 asks: "With respect to injuries and damages, please provide the amounts charged to expense and the amounts actually paid by the Company for each of the last 5 years."

d. Data Request No. 36 asks: "In reference to injuries and damages, please provide the purpose of each settlement and/or payment in excess of \$250,000 for the last 5 years. Updating as additional information becomes available."

e. Data Request No. 39 asks: " Please provide the following information for the parent company and each affiliate for 1997, 1998, 1999 and the current year to date. A) Number of Employees, B) Average number of customers, C) Total operating revenues, D) Direct labor charged to operations, E) How corporate costs are allocated to each subsidiary and or division."

f. Data Request No. 42, as revised during the October 18, 2000, conference, asks: "For the years 1995, 1996, 1997, 1998 and 1999, please provide (by billing period) the

intrastate interLATA and intrastate intraLATA originating, terminating and special access minutes of use to include associated revenues. In addition please provide the monthly data by month for the current year.”

g. Data Request No. 48 asks: “Please identify the per book bad debt expense by month for the last 4 years and the current year to date. In addition please provide all workpapers, documents, etc. used to support the per book bad debt expense. If bad debts are allocated between jurisdiction please provide the following: A) Total Company bad debts amounts, B) Company allocation factors, C) The allocated amount of bad debts.

13. The information sought by these data requests is relevant or likely to lead to the discovery of relevant information. The Staff needs to review the information from prior years to observe whether any trends are present in order to propose a test year normalized level of the requested items. Concerning Data Request No. 22, overtime hours and dollars are an integral component of total payroll cost, which is a significant portion of operating expenses. Concerning Data Request Nos. 34, 35 and 36, test year liability insurance pay-outs and injuries and damages should not be a significant portion of operating expenses, and a comparison with prior years’ data will provide the Staff with a basis for its analysis. Concerning Data Request No. 39, the Staff will use the requested information to verify that costs are appropriately allocated between the Company and its affiliates. Concerning Data Request No. 42, the Staff will use the requested information to validate the Company’s September 25, 2000 “Proprietary” filing versus a normal test year. Concerning Data Request No. 48, the recovery of bad debts is also an operating expense.

14. The Staff does not agree to the Company’s request to have all of the data requests answered within 40 days or by November 7, 2000, nor has the Company shown good cause to

modify the time limit. This case is on a 150-day schedule. Although the Company has indicated a willingness to provide data request answers as they become available, allowing the Company to take up to 40 days to finish answering the data requests will significantly inhibit the Staff's ability to analyze the responses, to send out follow up data requests, and to prepare its case while meeting procedural deadlines.

15. As of October 25, 2000, the Company has not provided any response to Staff Data Request Nos. 1-50, 3801, or 3802

WHEREFORE, the Staff requests the Commission to issue an order compelling the Company to promptly answer all of these Staff data requests and to promptly provide the multi-year information requested in Data Request Nos. 22, 34, 35, 36, 39, 42 and 48.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Keith R. Krueger
Deputy General Counsel
Missouri Bar No. 23857

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-4140 (Telephone)
(573) 751-9285 (Fax)
e-mail: kkruieg01@mail.state.mo.us

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 October .



Attachment A

Please provide a copy of all communications with shareholders for the last 3 years. Please update this request as additional information becomes available.

[illegible]

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Date Response Received:

Prepared By:

Please provide a copy of all data requests submitted by all other parties to this rate case proceeding and company's response to each data request. Update this request as new data requests are received.

Requested By: David Winter

[illegible]

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received:

Prepared By:

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please arrange for a review of the last three years workpapers of the Company's external auditors.

Requested By: David Winter

[illegible]

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By: _____

Date Response Received:

Prepared By:

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide a copy or make available for Staff's review, the minutes of the Board of Director's meetings held for the last 3 years and the current year to date. A) Please provide a copy of any handouts and/or financial analysis used at the meetings. B) If minutes are kept for Executive Committee meetings, make these available also.

Requested By: David Winter

[illegible]

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By:

Date Response Received: _____

Prepared By:

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide a list of all internal and external financial, statistical, jurisdictional and/or operational reports generated by or on behalf of the Company and or each of the Company's affiliates. A) Please provide a complete description of each report listed above. B) Please identify the frequency (dates) and distribution for each report listed.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received: _____

Prepared By: _____

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide Staff with a copy of the Company's detailed general ledger for 1999 and the current year to date. Please update as new information /reports become available.

Requested By: David Winter

Information Provided:

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By: _____

Date Response Received:

Prepared By: _____

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide a copy of the Company's system of accounts , and the accounting policy manual. A) Also provide any controller's letters issued for the previous year as well as the current year to date related to Company's accounting systems. Please update this information throughout the audit as information becomes available.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received:

Prepared By: _____

Please provide a list of all standard journal entries used by the Company and/or parent Company.

[illegible]

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Signed By: _____

Date Response Received:

Prepared By:

Please provide the monthly financial statements for January 1999 to present. Please update as new reports become available.

Information Provided:

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received:

Prepared By:

Please provide Company's operating and capital budgets for 1998-2000. A) For each of these years please provide a schedule comparing budgeted results to actual. B) Please provide an analysis of any significant variances of actual to budgeted. C) Please include cash budgets, and/or analysis that the company has performed related to cash requirements for both the company and for the period referenced. D) Please provide an analysis of any large variances between budgeted and actual results.

[illegible]

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By:

Date Response Received:

Prepared By:

Please provide Company's operating and capital budgets for 2001 and 2002. Please explain any material change from current operations.

Information Provided:

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By: _____

Date Response Received: _____

Prepared By: _____

Please provide a copy of the monthly, quarterly and annual reports used by senior management for 1997-1999 and the current year to date.

[illegible]

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By:

Date Response Received:

Prepared By:

Please provide the current Business and Strategic Plans for the Company. Please update as new plans become available.

Information Provided:

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Prepared By:

Information Requested:

Requested By: David Winter

Information Provided:

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By: _____

Date Response Received: _____

Prepared By: _____

Please provide a copy of all in-house publications, newsletters, etc. distributed during the last year and the current year to date. Please update as new publications or newsletters are distributed.

Information Provided:

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Date Response Received:

Prepared By:

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide a copy of the Company's current organizational chart with the names of current management personnel.

Requested By: David Winter

[illegible]

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Signed By: _____

Date Response Received:

Prepared By:

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide a list of all Company personnel and their salary/hourly wage as of December 31, 1999 and the end of the known and measurable period of June 30, 2000. Please provide by employee group, i.e. by union, no-union hourly, salaried. Please include as separate entries all employee bonuses and other payments.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received:

Prepared By: _____

Information Requested:

Please provide a list by month of all bonuses/awards that were given to employees during the 12-months ended December 31, 1999 and any given given during 2000 to date. 2) Please provide a detailed description of each bonus/award indicating the actions that were rewarded and explain the benefit to a) Company b) The Missouri ratepayer.

Requested By: David Winter

[illegible]

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Signed By: _____

Date Response Received:

Prepared By: _____

For the 12-months ended December 31, 1999 please provide the amount of payroll charged to the income statement and balance sheet accounts by account. Please provide workpapers and documents supporting these numbers.

[illegible]

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Date Response Received:

Prepared By:

Please provide the names and job titles of all employees hired since the end of the test year (insert date) and the names and job titles of all employees who were employees as of the end of the test year who are no longer employed and the date of termination. Please update this data request as new information becomes available.

[illegible]

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Signed By:

Date Response Received:

Prepared By: _____

Please provide overtime hours and dollars by month by employee for the previous 5 years and the current year to date.

Information Provided:

Prepared By:

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please identify all paid employee benefits. Please explain how the cost of each benefit is recorded on the Company's books.

Requested By: David Winter

[illegible]

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Signed By:

Date Response Received:

Prepared By: _____

Please provide the test year expense for medical and dental insurance premiums.

Information Provided:

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Date Response Received:

Prepared By: _____

Information Requested:

[illegible]

Prepared By: _____

Information Requested:

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received:

Prepared By:

Please provide the current payroll tax rates and limits for the current year and for the next year if they are scheduled to change. (i.e., FICA, FUTA, and SUTA tax rates). Please identify any change expected for 2001.

Requested By: David Winter

[illegible]

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Signed By: _____

Date Response Received: _____

Prepared By: _____

Please provide a copy of any union contracts for all types of union employees, the amount of wage increase and the dates those increases become effective for the length of the contract.

[illegible]

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Signed By:

Date Response Received:

Prepared By:

Please indicate what type of retirement system the company has in place (401, defined benefit, etc.) If the company has a defined benefit retirement plan, please provide a copy of the 3 most recent actuarial reports for all pension and OPEB plans for the Company and it's parent company.

[illegible]

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Signed By: _____

Date Response Received:

Prepared By: _____

Please provide current copies of all insurance policies/contracts the Company currently has in effect. Please list the following: A) Time period covered, B) Premium, C) Deductibles, D) Liability limits of coverage. 2) Please list the amount of expense associated with each policy included in the test year.

Information Provided:

Prepared By:

Please provide a detailed list of all injuries and damages claims paid since January 1, 1998 and indicate the payment amount and payment date.

Requested By: David Winter

[illegible]

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Signed By:

Date Response Received:

Prepared By:

Please provide a listing of all lawsuits and/or claims which were pending on January 1, 1998 or which have been filed and/or made against the Company since that date. Please indicate the current status of each.

Information Provided:

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Prepared By: _____

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide a detailed list of all injuries and damages claims currently pending. Please indicate the current status of each.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received:

Prepared By: _____

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide the amounts of all Liability Insurance pay-outs per accident for the Company for the last 5 years and the current year to date.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received:

Prepared By:

CASE NO. TT-01-117

Date Requested: 09/28/00

Information Requested:

With respect to injuries and damages, please provide the amounts charged to expense and the amounts actually paid by the Company for each of the last 5 years.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received:

Prepared By:

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

In reference to injuries and damages, please provide the purposes for each settlement and/or payment in excess of \$250,000 for the last 5 years. Updating as additional information becomes available.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received: _____

Prepared By: _____

CASE NO. TT-01-117

Date Requested: 09/28/00

Information Requested:

Please provide a complete explanation of all operations of the Company, which are not regulated by the Missouri PSC. A) Please provide separate income statements and balance sheets for each non-regulated activity for 1998 and 1999 and the current year to date.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received: _____

Prepared By: _____

Information Requested:

Please provide an income statement and balance sheet for all affiliated companies or divisions of the parent company for the last 2 years and the current year to date.

Requested By: David Winter

Information Provided:

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Signed By: _____

Date Response Received:

Prepared By: _____

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide the following information for the parent company and each affiliate for 1997, 1998, 1999 and the current year to date. A) Number of Employees, B) Average number of customers, C) Total operating revenues, D) Direct labor charged to operations. E) How corporate costs are allocated to each subsidiary and or division.

Requested By: David Winter

[illegible]

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Signed By:

Date Response Received:

Prepared By: _____

Information Requested:

Please provide a list of all outside consulting contracts for the last 2 years and the current year to date. For each contract please list the following: A) Purpose of the contract. B) Length of the contract. C) Cost of the contract. D) Accounts where the costs were booked.

Requested By: David Winter

[illegible]

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If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed By:

Date Response Received:

Prepared By: _____

Please provide the quantities and rates at December 31, 1999 and June 30, 2000 for Basic Service and Vertical Features/Services in the attached format. If there is Basic Service and Vertical Featured/Services not listed please provide the associated quantities and rates as of December 31, 1999 and June 30, 2000.

[illegible]

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Prepared By: _____

Basic Service

Line	Basic Service	==>Residential<==		==>Business<==	
		Quantity	Rate	Quantity	Rate
1	Local Access - R1/B1				
2	Local Access - R2/B2				
3	Local Access - R3/B3				
4	Local Access - Multi-Line Business				
5	Second Line - R1/B1				
6	Second Line - R2/B2				
7	Second Line - R3/B3				
8	Extended Area Service (Required)				
9	Extended Area Service (Optional)				
10	Touch Tone				
11	Foreign Exchange Line (FX)				
12	Extra Drop				
13	Extra Drop - Mileage				
14	Local High Capacity				
15	Local High Capacity - Mileage				
16	Local Private Line				
17	Company Payphones				
18	Payphone Line				
19	Official				
20	Employee Concession				

For the years 1995,1996,1997,1998 and 1999, please provide (by billing period) the intraLATA interLATA and intraLATA intraLATA originating, terminating and special access minutes of use to include associated revenues. In addition, please provide the monthly data by month for the current year.

[illegible]

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Prepared By: _____

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

As a result of the PTC decision, did the Company set up a toll subsidiary? If so, please explain how the Company accounts for the revenues and expenses associated with the subsidiary. Please provide any external or internal financial statements concerning the toll subsidiary. Does the Company impute originating minutes of use for it's toll subsidiary?

Requested By: David Winter

[illegible]

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Signed By: _____

Date Response Received:

Prepared By: _____

Please provide the summary sheets from the Company's last separations study.

Information Provided:

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By: _____

Date Response Received:

Prepared By:

Information Requested:

Please identify in what USOA account(s) these amounts were recorded.

[illegible]

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By: _____

Date Response Received:

Prepared By:

CASE NO. TT-01-117

Information Requested:

[illegible]

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Ozark Telephone Company office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Prepared By: _____

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide an explanation of how the company accounts for bad debts and net charge offs.

Requested By: David Winter

Information Provided:

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed By: _____

Date Response Received:

Prepared By: _____

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please identify the per book bad debt expense by month for the last 4 years and the current year to date. In addition please provide all workpapers, documents, etc. used to support the per book bad debt expense. If bad debts are allocated between jurisdiction please provide the following: A) Total Company bad debt amounts, B) Company allocation factors, C) The allocated amount of bad debts.

Requested By: David Winter

[illegible]

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Signed By: _____

Date Response Received:

Prepared By: _____

DATA INFORMATION REQUEST

Ozark Telephone Company

CASE NO. TT-01-117

Requested From: William R. England

Date Requested: 09/28/00

Information Requested:

Please provide a copy of each advertisement charged to expense 1999 and the current year to date. 2) Please provide the cost of each advertisement and the account charged. 3) Please provide the same information for advertising costs billed to the Company by any affiliate or by the corporate headquarters.

Requested By: David Winter

[illegible]

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Signed By: _____

Date Response Received:

Prepared By: _____

Information Requested:

Information Provided:

Prepared By: _____

DATA INFORMATION REQUEST
OZARK TELEPHONE COMPANY
CASE NUMBER TT-01-117

No. 3801

Requested From: Mr. Brian T. McCartney

Date Requested: September 27, 2000

Information Requested: Please provide the following financial statements for the twelve-months ending December 31, 1999, and update of June 30, 2000, for Ozark Telephone Company:

1. Balance Sheet; and

2. Income Statement

Requested By: David Murray, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in Ozark Telephone Company's Seneca, Missouri office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or others employed by or acting in its behalf.

Signed by: _____

Date Response Received: _____

Prepared by: _____

DATA INFORMATION REQUEST
OZARK TELEPHONE COMPANY
CASE NUMBER TT-01-117

No. 3802

Requested From: Mr. Brian T. McCartney

Date Requested: September 28, 2000

Information Requested: Please provide, in detail, including any supporting calculations, the following items for each issue for Ozark Telephone Company's short-term debt, long-term debt and preferred stock (if any) as of December 31, 1999 and the update period of June 30, 2000:

1. The embedded debt cost (cost to company);
2. Description of each issuance;
3. Issuance date and maturity date;
4. Principal amount originally issued and the amount outstanding;
5. Interest rate and interest payment dates.

In reference to Ozark Telephone Company's short-term debt (debt with maturity of less than 12 months), please provide short-term debt balances for the twelve-months ended December 31, 1999, and the update period of June 30, 2000, and an explanation of how the interest rates are determined for each loan. As an example, are the interest rates based upon equations such as one percentage point below prime, a commercial paper rate or negotiated between the parties at no predetermined rate? Please provide the average short-term debt interest rate paid by Ozark Telephone Company for the twelve-month period ended December 31, 1999, and June 30, 2000.

Requested By: David Murray, Financial Analyst

Information Provided: _____

The attached information provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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Signed by: _____

Date Response Received: _____

Prepared by: _____

LAW OFFICES

BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65102-0456

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CHARLES E. SMARR
DEAN L. COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
BRIAN T. MCCARTNEY
DALE T. SMITH

OF COUNSEL
RICHARD T. CLOTTONE

October 6, 2000

VIA FACSIMILE

Mr. Keith Krueger
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: Case No. TT-2001-117
Ozark Telephone Company

Dear Keith:

On September 28, 2000, I received on behalf of Ozark Telephone Company (Company) 52 data requests from Staff in the above-captioned matter (Nos. 1-50 and 3801-3802). It is my understanding that many, if not all, of these data requests are "standard" data requests issued when a utility seeks a rate increase. Many of these requests are extensive and appear to be geared more towards a large utility company. As a small telephone company, the Company's resources are limited and it does not appear that it will be able to answer all of the data requests within the twenty (20) day period of time. The Company will provide Staff with copies of responses as they are available and expects to have all of the data requests answered within forty (40) days or by November 7, 2000.

I have also tried to contact Dave Winter to obtain some clarification for several of the data requests but I understand that he is out of the office until Monday. Therefore, in order to avoid missing any deadlines, I am making the following objections to certain data requests (but it is my hope that given further discussion with Staff we can resolve our concerns regarding these data requests):

1) Data Request No. 26 asks for the identify of the officers and Board of Directors for the Company, its parent and each affiliated company for the last two years. However, it also asks for the names of any companies that any member of the Board of Directors or significant individual shareholder (more than 3% of the outstanding common stock) is associated with as an employee, significant shareholder or director. The Company objects to the second part of this request insofar as it requires information regarding a Board member's or a shareholder's relationship with other, unaffiliated companies as it is overbroad and burdensome and not relevant to the instant proceeding (nor is it likely to lead to the discovery of relevant information).

Attachment B

October 6, 2000

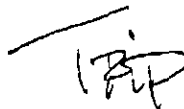
Page 2

2) Data Requests No. 22, 34, 35, 36, 39, 42 and 48 seek a variety of information for a number of years prior to 1999 (as well as for 1999 and the current year). Again, the Company objects to these requests, insofar as they seek information prior to 1999, as they are overbroad and burdensome and not relevant to the instant proceeding (nor are they likely to lead to the discovery of relevant information). The Company will provide information for 1999 and the current year.

Finally, as you know, the Company does not believe that the tariff filing that initiated this case constitutes a "rate increase" request inasmuch as the Company did not file for "an overall increase in revenues through a company-wide increase in rates" 4 CSR 240-10.070(2). Accordingly, by responding to these data requests, I want to make it clear that the Company has not implicitly agreed or admitted that it is seeking a rate increase in this proceeding.

If, after review of this letter, you have any questions or want to discuss it more thoroughly, please call at your convenience.

Sincerely,



W.R. England, III

WRE/da

Enclosure

cc: Mr. Dave Winter

Service List for
Case No. TT-2001-117
October 25, 2000

Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102

W.R. England, III
Brydon, Swearengen & England
PO Box 456
Jefferson City, MO 65102