

Commissioners

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Missouri Public Service Commission

POST OFFICE BOX 360 JEFFERSON CITY, MISSOURI 65102 573-751-3234 573-751-1847 (Fax Number) http://www.psc.state.mo.us October 25, 2000 BRIAN D. KINKADE Executive Director

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> WESS A. HENDERSON 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

RE: Case No. TT-2001-117

FILED²
OCT 2 5 2000

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

Deputy General Counsel

(573) 751-4140

Kenta R. Kruege

(573) 751-9285 (Fax)

KRK/dkf Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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Service	Commission
1-117 00100203	Commission

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

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

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.

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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.

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- 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.

- 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."

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- 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 data. 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

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: kkrueg01@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 25^{th} day of October .

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

Please provide a complete set of workpapers supporting all off Company's exhibits, schedules, adjustments, etc. in the Company's filing. A) Also, please provide a copy of disk of all coputer files (formulas intact) used to produce the above responses. B) For each computer file, please identify the file name, reference to the printed document, and software used. C) Where not self-explanatory, please describe the formulas and assumptions used in each file. If possible for each mainframe generated report please provide a copy of the same printout on diskette (ASCII or EXCEL format). If necessary please call and discuss these items with us.

Requested By:	David Winter
Information Provided:	
information request is facts of which the und Missouri Public Servic	ermation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the de Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
requestor to have docu agreeable. Where iden memorandum, report) an author, date of public possession of the docu workpapers, letters, m transcriptions and pri knowledge. The pronou	evoluminous, please (1) identify the relevant documents and their location (2) make arrangements with ments available for inspection in the Ozark Telephone Company office, or other location mutually utification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, sation and publisher, addresses, date written, and the name and address of the person(s) having ment. As used in this data request the term "document(s)" includes publication of any format, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, anted, typed or written materials of every kind in your possession, custody or control within your mayou" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or acting in its behalf.
	Signed By:
Date Response Received	lt
	Prepared By:
	- reputer of .

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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

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Requested By:	David Winter
Information Provided:	
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	Signed By:
Date Response Received	1:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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
Information Provided:	
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	Signed By:
ate Response Received	;
	Prepared By:

DATA INFORMATION REQUEST Ozark Telephone Company CASE NO. TT-01-117

Pomiested	Exce.
Requested	r rom:

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
Information Provided:	
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information request is facts of which the und Missouri Public Servic discovered which would If these data are requestor to have docu agreeable. Where iden memorandum, report) an	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters as materially affect the accuracy or completeness of the attached information. voluminous, please (1) identify the relevant documents and their location (2) make arrangements with ments available for inspection in the Ozark Telephone Company office, or other location mutually tification of a document is requested, briefly describe the document (e.g. book, letter, d state the following information as applicable for the particular document: name, title, number, ation and publisher, addresses, date written, and the name and address of the person(s) having
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	Signed By:
Date Response Received	1
	Prepared By:
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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
Information Provided:	
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	Signed By:
Date Response Received	1:
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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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information request is facts of which the und Missouri Public Servic discovered which would If these data are	prmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the see Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	1:
	Prepared By:

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:	
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information request is facts of which the und Missouri Public Service discovered which would lift these data are requestor to have document agreeable. Where iden memorandum, report) are author, date of public possession of the document workpapers, letters, retranscriptions and priknowledge. The pronout	primation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters a materially affect the accuracy or completeness of the attached information. The voluminous, please (1) identify the relevant documents and their location (2) make arrangements with ments available for inspection in the Ozark Telephone Company office, or other location mutually attification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, cation and publisher, addresses, date written, and the name and address of the person(s) having memorand notes, reports, analyses, computer analyses, test results, studies of data, recordings, inted, typed or written materials of every kind in your possession, custody or control within your acting in its behalf.
	Signed By:
Date Response Received	
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	December of December 1

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:	
information request is facts of which the una Missouri Public Service	ormation provided to the Missouri Public Service Commission Staff in response to the above data s accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are d materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Receive	d:
	Prepared Ry

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 standard journal entries used by the Company and/or parent Company.

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Servic	primation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	3:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Service	ormation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the see Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters and materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	l:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
information request is facts of which the und Missouri Public Service discovered which would If these data are requestor to have docuagreeable. Where idem memorandum, report) an author, date of public possession of the docuworkpapers, letters, manascriptions and pri	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or emissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information. voluminous, please (1) identify the relevant documents and their location (2) make arrangements with ments available for inspection in the Ozark Telephone Company office, or other location mutually tification of a document is requested, briefly describe the document (e.g. book, letter, d state the following information as applicable for the particular document: name, title, number, ation and publisher, addresses, date written, and the name and address of the person(s) having ment. As used in this data request the term "document(s)" includes publication of any format, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, nted, typed or written materials of every kind in your possession, custody or control within your n "your" refers to Ozark Telephone Company and its employees, contractors, agents or acting in its behalf.
	Signed By:
Date Response Received	*

Prepared By: ____

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Servic	ormation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	l:
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	Prepared By:

DATA INFORMATION REQUEST Ozark Telephone Company CASE NO. TT-01-117

Requested	From:
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William R. England

Date Requested:

09/28/00

Information Requested:

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

Requested By:	David Winter
Information Provided:	
	
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	Signed By:
Date Response Received:	
	Proposed Pro
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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

Requested By:	David Winter
Information Provided:	
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information request is facts of which the un Missouri Public Servi discovered which would	primation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	d:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

Please provide a copy of the Company's current policies and procedures manual. Please note any changes that have taken place since the last rate case.

Requested By:	David Winter
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Information Provided:	
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information request is facts of which the und Missouri Public Servic	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	·
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
	
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information request is facts of which the und Missouri Public Servic	ermation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the see Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are imaterially affect the accuracy or completeness of the attached information.
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	Prepared By:

DATA INFORMATION REQUEST Ozark Telephone Company CASE NO. TT-01-117

Request	~4	Eron.	
rednesc	eu	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
Information Provided:	
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	Signed By:
Date Response Received	1 :
	Prepared By:

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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 seperate entries all employee bonuses and other payments.

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Service discovered which would If these data are requestor to have docuagreeable. Where iden memorandum, report) and memorandum, report (missouri public p	ermation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the see Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters as a materially affect the accuracy or completeness of the attached information. Evoluminous, please (1) identify the relevant documents and their location (2) make arrangements with ments available for inspection in the Ozark Telephone Company office, or other location mutually utification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, exation and publisher, addresses, date written, and the name and address of the person(s) having
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	Signed By:
Date Response Received	tr
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Requested From:

William R. England

Date Requested:

09/28/00

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
Information Provided:	
information request is facts of which the und Missouri Public Service	ormation provided to the Missouri Public Service Commission Staff in response to the above data is accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	d:
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	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
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information request in facts of which the un- Missouri Public Servi-	ormation provided to the Missouri Public Service Commission Staff in response to the above data s accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are d materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Receive	d:
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	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Servic	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	f

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

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Service	primation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	I:
	Departed By

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			
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Information Provided:				······
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			Signed By:	
Date Response Received	:			
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			Prepared By:	

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Servic discovered which would	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are 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

William R. England

Date Requested:

09/28/00

Information Requested:

Please provide a list of all compensation studies performed by Company and/or an outside consultant for the last 3 years.

Requested By:	David Winter
Information Provided:	
	
information request is facts of which the und dissouri Public Service discovered which would If these data are requestor to have docu agreeable. Where ider memorandum, report) are author, date of public possession of the docu workpapers, letters, m	prmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the dersigned agrees to immediately inform the derection Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are a materially affect the accuracy or completeness of the attached information. Evoluminous, please (1) identify the relevant documents and their location (2) make arrangements with unents available for inspection in the Ozark Telephone Company office, or other location mutually utification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, cation and publisher, addresses, date written, and the name and address of the person(s) having unent. As used in this data request the term "document(s)" includes publication of any format, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, inted, typed or written materials of every kind in your possession, custody or control within your
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	Signed By:
Date Response Received	l:
	Prepared By:
	repared 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 Officers and Board of Directors for the Company, it's parent and each affiliated company for the last two years. Also provide the names of any other 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.

Requested By:	David Winter
Information Provided:	
information request is facts of which the und Missouri Public Servid discovered which would If these data are requestor to have document and the memorandum, report) and author, date of public possession of the document workpapers, letters, stranscriptions and presents of the contraction of the document of the documen	primation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are distanced and materially affect the accuracy or completeness of the attached information. Be voluminous, please (1) identify the relevant documents and their location (2) make arrangements with numents available for inspection in the Ozark Telephone Company office, or other location mutually nutification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, cation and publisher, addresses, date written, and the name and address of the person(s) having unent. As used in this data request the term "document(s)" includes publication of any format, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, inted, typed or written materials of every kind in your possession, custody or control within your in "your" refers to Ozark Telephone Company and its employees, contractors, agents or
	acting in its behalf.
	Signed By:
Date Response Received	i:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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
Information Provided:	
	
information request is facts of which the und Missouri Public Service discovered which would lift these data are requestor to have docu agreeable. Where idea memorandum, report) as author, date of public	promation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the dee Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are distanced materially affect the accuracy or completeness of the attached information. The voluminous, please (1) identify the relevant documents and their location (2) make arrangements with aments available for inspection in the Ozark Telephone Company office, or other location mutually notification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, cation and publisher, addresses, date written, and the name and address of the person(s) having
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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 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.

Requested By:	David Winter
Requesced by:	David wincer
Information Provided:	

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information request is facts of which the und Missouri Public Servic	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters as materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Service discovered which would like the service discovered which would like the service data are requestor to have documented agreeable. Where idented memorandum, report) as author, date of public possession of the documented workpapers, letters, remascriptions and priknowledge. The pronound	primation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the dee Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are imaterially affect the accuracy or completeness of the attached information. Be voluminous, please (1) identify the relevant documents and their location (2) make arrangements with a unents available for inspection in the Ozark Telephone Company office, or other location mutually attification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, cation and publisher, addresses, date written, and the name and address of the person(s) having unent. As used in this data request the term "document(s)" includes publication of any format, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, inted, typed or written materials of every kind in your possession, custody or control within your an "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or acting in its behalf.
	Signed By:
Date Response Received	1:

Prepared By: ____

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
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	Signed By:
Date Response Received	lf

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 paid since January 1, 1998 and indicate the payment amount and payment date.

Requested By:	David Winter
Information Provided:	
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nformation request is acts of which the und Missouri Public Servic	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
ate Response Received	F
	Dranged 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 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.

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
T-Foundation Duranting	
Information Provided:	
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information request i facts of which the un Missouri Public Servi	ormation provided to the Missouri Public Service Commission Staff in response to the above data s accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are d materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Receive	d:
	Proposed But

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

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.

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Requested By:	David Winter
Information Provided:	
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information request is facts of which the und Missouri Public Service	ormation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	1

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.

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 helief. The undersigned agrees to immediately inform the Missouri Public Service Commission of the commission, hased upon present facts of which the undersigned has knowledge, information or helief. 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 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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information request is facts of which the und Missouri Public Service	ermation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the de Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	·

Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

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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information request is facts of which the und Missouri Public Service	rmation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present ersigned has knowledge, information or belief. The undersigned agrees to immediately inform the e Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	;
	Prepared By:
	repared by .

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
Information Provided:	
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	Signed By:
Date Response Received	le
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

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.

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Requested By:	David Winter
Information Provided:	
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	Signed By:
Date Response Received	:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
information request is facts of which the und Missouri Public Servid discovered which would lift these data are requestor to have doctagreeable. Where idea memorandum, report) as	ormation provided to the Missouri Public Service Commission Staff in response to the above data is accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the decommission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are dimaterially affect the accuracy or completeness of the attached information. Evoluminous, please (1) identify the relevant documents and their location (2) make arrangements with aments available for inspection in the Ozark Telephone Company office, or other location mutually intification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number,
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	Signed By:
Date Response Received	d:
	Prepared By:

Basic Service

		==>Reside	ntial<=	==>Busin	iess<==
Line	Basic Service	Quantity	Rate	Quantity	Rate
i	Local Access - R1/B1				
	I 1 4				

- 2 Local Access R2/B2
- 3 Local Access R3/B3
- 4 Local Access Muli-Line Business
- 5 Second Line RI/BI
- 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 (FN)
- 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



Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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.

Requested By:	David Winter
Information Provided:	
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	Signed By:
Date Response Received	·
	Prepared By:

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
Information Provided:	
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	Signed By:
Date Response Received	!÷
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	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

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

Requested By:	David Winter
Information Provided:	
	
	
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	Signed By:
Date Response Received	ł:
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

Please identify all Federal Universal Service Funds received by the Company in 1999 and the current year to date. Please identify in what USOA account(s) these amounts were recorded.

Requested By:	David Winter
Information Provided:	
	
	
information request is facts of which the und Missouri Public Service	primation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
requestor to have door agreeable. Where iden memorandum, report) an author, date of public possession of the door workpapers, letters, r transcriptions and pri	evoluminous, please (1) identify the relevant documents and their location (2) make arrangements with aments available for inspection in the Ozark Telephone Company office, or other location mutually attification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, cation and publisher, addresses, date written, and the name and address of the person(s) having ament. As used in this data request the term "document(s)" includes publication of any format, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, anted, typed or written materials of every kind in your possession, custody or control within your in "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or acting in its behalf.
	Signed By:
Date Response Received	l:
	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 and quantify all items or events that occurred other than the elimination of the PTC plan that the Company considers to be significant events or variance from continuing normal operations. Please include a copy of all supporting documentation.

Requested By:	David Winter	
Information Provided:		
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information request is facts of which the und Missouri Public Service	mation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon presentsigned has knowledge, information or belief. The undersigned agrees to immediately inform the Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters materially affect the accuracy or completeness of the attached information.	
requestor to have docu agreeable. Where iden memorandum, report) an author, date of public possession of the docu workpapers, letters, m transcriptions and pri	voluminous, please (1) identify the relevant documents and their location (2) make arrangements with earts available for inspection in the Ozark Telephone Company office, or other location mutually diffication of a document is requested, briefly describe the document (e.g. book, letter, state the following information as applicable for the particular document: name, title, number, tion and publisher, addresses, date written, and the name and address of the person(s) having ent. As used in this data request the term "document(s)" includes publication of any format, moranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, ted, typed or written materials of every kind in your possession, custody or control within your "you" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or citing in its behalf.	th
	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 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 Conformation request is accurate and complete, and contains no material facts of which the undersigned has knowledge, information or belief. The Missouri Public Service Commission Staff if, during the pendency of Cast discovered which would materially affect the accuracy or completeness of the conformation of the confor	misrepresentations or omissions, based upon present The undersigned agrees to immediately inform the se No. TT-01-117 before the Commission, any matters are
If these data are voluminous, please (1) identify the relevant docrequestor to have documents available for inspection in the Ozark Telegagreeable. Where identification of a document is requested, briefly dememorandum, report) and state the following information as applicable fauthor, date of publication and publisher, addresses, date written, and possession of the document. As used in this data request the term "docworkpapers, letters, memoranda, notes, reports, analyses, computer anal transcriptions and printed, typed or written materials of every kind in knowledge. The pronoun "you" or "your" refers to Ozark Telephone Compacthers employed by or acting in its behalf.	chone Company office, or other location mutually escribe the document (e.g. book, letter, for the particular document: name, title, number, if the name and address of the person(s) having cument(s) includes publication of any format, lyses, test results, studies of data, recordings, in your possession, custody or control within your
	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
Information Provided:	
information request is facts of which the und Missouri Public Service	ermation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the ce Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
requestor to have docu agreeable. Where iden memorandum, report) an author, date of public possession of the docu workpapers, letters, r transcriptions and pri	evoluminous, please (1) identify the relevant documents and their location (2) make arrangements with ments available for inspection in the Ozark Telephone Company office, or other location mutually stification of a document is requested, briefly describe the document (e.g. book, letter, and state the following information as applicable for the particular document: name, title, number, eation and publisher, addresses, date written, and the name and address of the person(s) having ment. As used in this data request the term "document(s)" includes publication of any format, memoranda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, anted, typed or written materials of every kind in your possession, custody or control within your memorand 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 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
Information Provided:	
information request is facts of which the und Missouri Public Service	ermation provided to the Missouri Public Service Commission Staff in response to the above data accurate and complete, and contains no material misrepresentations or omissions, based upon present dersigned has knowledge, information or belief. The undersigned agrees to immediately inform the see Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are materially affect the accuracy or completeness of the attached information.
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	Signed By:
Date Response Received	15
	Prepared By:

Requested From:

William R. England

Date Requested:

09/28/00

Information Requested:

For any items relating to dues, memberships, subscriptions, donations or contributions to any organization (including schools and universities) charged "above the line to expense" for the 12 months ending December 31, 1999: Please provide for each item: A) The regular and special assessment amounts, B) the costs associated with each by account, C) a detailed explanation for each amount, the purpose and any benefit received by 1) Company and 2) Missouri Customers from each expenditure.

Requested By: Dav	rid Winter
Information Provided:	
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facts of which the undersi Missouri Public Service Co discovered which would mat	ion provided to the Missouri Public Service Commission Staff in response to the above data wrate and complete, and contains no material misrepresentations or omissions, based upon present gned has knowledge, information or belief. The undersigned agrees to immediately inform the manission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are erially affect the accuracy or completeness of the attached information. uminous, please (1) identify the relevant documents and their location (2) make arrangements with
requestor to have document agreeable. Where identifi memorandum, report) and st author, date of publication possession of the document workpapers, letters, memoral transcriptions and printed	s available for inspection in the Ozark Telephone Company office, or other location mutually cation of a document is requested, briefly describe the document (e.g. book, letter, ate the following information as applicable for the particular document: name, title, number, and publisher, addresses, date written, and the name and address of the person(s) having an and publisher, addresses, date written, and the name and address of the person(s) having a used in this data request the term "document(s)" includes publication of any format, anda, notes, reports, analyses, computer analyses, test results, studies of data, recordings, typed or written materials of every kind in your possession, custody or control within your ou" or "your" refers to Ozark Telephone Company and its employees, contractors, agents or
	Signed By:
Date Response Received:	
	Prepared By.

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

U	

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 S	heet; and
2. Income Sta	atement
Requested By: <u>Davi</u>	d Murray, Financial Analyst
Information Provided:	
····	
contains no material misrepre immediately inform the Missou	rmation provided to the Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and esentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to uri Public Service Commission Staff if, during the pendency of Case No. TT-01-117 before the Commission, any matters are discovered which would or completeness of the attached information.
inspection in Ozark Telephon document (e.g. book, letter, m publisher, addresses, date wri publication of any format, work written materials of every kind	voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for le Company's Seneca, Missouri office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the lemorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and itten, 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 chapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Ozark Telephone Company and its employees, employed by or acting in its behalf.
	Clanad bus
Data Daspones Danakerd	Signed by:
Date Response Received:	
	Prenared by

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

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 Co	empany'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 embedo	ded debt cost (cost to company);
2. Description	of each issuance;
Issuance da	te and maturity date;
4. <u>Principal am</u>	nount originally issued and the amount outstanding;
5. <u>Interest rate</u>	and interest payment dates.
In reference to Ozark Te	elephone 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.	
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.	

Date Response Received:

Signed by:

Prepared by:



LAW OFFICES

BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

2 | 2 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65 | 02-0456

TELEPHONE (573) 636-7 | 88

FACSIMILE (573) 634-743 |

EHALITRIP@BRYDONLAW.COM

CHARLES E. SMARR
DEAN L. COOPER
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TIMOTHY T. STEWART
GREDORY C. MITCHELL
BRIAN T. MCCARTNEY
DALE T. SMITH

OF COUNSEL RICHARD T. CIOTTONE

October 6, 2000

VIA FACSIMILE

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A BOUDREAU

BONDRA B. MORGAN

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K, RICHARDSON

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

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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

P.05

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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