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September 1, 2000

BRIAN D. KINKADE  
Executive Director

GORDON L. PERSINGER  
Director, Research and Public Affairs

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

FILED<sup>3</sup>

SEP 01 2000

Missouri Public  
Service Commission

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

**RE: Case No. TO-2000-667**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of the **STAFF'S MOTION TO ESTABLISH PROCEDURAL SCHEDULE**.

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,

*Wm K Haas*

William K. Haas  
Deputy General Counsel  
(573) 751-7510  
(573) 751-9285 (Fax)

WKH/lb  
Enclosure  
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
SEP 01 2000

Missouri Public  
Service Commission

In the Matter of the Investigation into the )  
Effective Availability for Resale of )  
Southwestern Bell Telephone Company's )  
Local Plus Service by Interexchange )  
Companies and Facilities-Based )  
Competitive Local Exchange Companies. )

Case No. TO-2000-667

**STAFF'S MOTION TO ESTABLISH PROCEDURAL SCHEDULE**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Motion states:

1. On August 22, 2000, the Missouri Public Service Commission (Commission) issued an Order Recognizing Issues And Directing Filing Of Procedural Schedule which, *inter alia*, directed the parties to file a proposed procedural schedule no later than September 1, 2000.

2. The parties convened a teleconference at which they agreed to propose the following procedural schedule:

October 2, 2000

SWBT Direct Testimony

ILEC Direct Testimony

Other Parties Direct Testimony (Optional)

November 8, 2000

All Parties Rebuttal Testimony

December 11, 2000

All Parties Surrebuttal Testimony

December 20, 2000

List of Issues and Order of Witnesses

January 3, 2001

All Parties Statements of Position

January 10-12, 2001

Hearing

3. This proposal allows both for Southwestern Bell Telephone Company (SWBT) to explain its Local Plus Service and for the ILEC (Incumbent Local Exchange Carrier) intervenors to explain their issues in the first round of testimony.

WHEREFORE, the Staff, on behalf of the parties, requests the Commission to adopt the above proposed procedural schedule.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

Wm K Haas  
William K. Haas  
Deputy General Counsel  
Missouri Bar No. 28701

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### 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 1<sup>st</sup> day of September 2000.

Wm K Haas

**Service List for:  
Case No. TO-2000-667  
September 1, 2000**

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