Lance J.M. Steinhart, P.C. Attorney At Law 1720 Windward Concourse Suite 250 Alpharetta, Georgia 30005

Also Admitted in New York and Maryland

Telephone: (770) 232-9200 Facsimile: (770) 232-9208 Email: lsteinhart@telecomcounsel.com

March 7, 2005

VIA OVERNIGHT DELIVERY

Mr. Dale Roberts Chief ALJ and Executive Secretary Missouri Public Service Commission 200 Madison Street, Suite 100 Jefferson City, MO 65102 FILED² MAR 0 8 2005

Missouri Public Ivice Commission

Re: Snappy Phone of Texas, Inc. d/b/a Snappy Phone Case No. CD-2005-0243

Dear Mr. Roberts:

Enclosed please find for filing an original and five (5) copies of a Response to Order Directing Filing in the above referenced docket.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully summitted, Lange M. Steinhart

Ger Bar No. 678222 Attorney for Snappy Phone of Texas, Inc. d/b/a Snappy Phone

Enclosures

cc: Leigh Woodruff

Michael Dandino, Office of Public Counsel

General Counsel, Missouri Public Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

MAR 0 8 2005

FILED²

In the matter of the application of) Snappy Phone of Texas, Inc. d/b/a Snappy Phone) for the cancellation of its Certificate) of Service Authority)

Missouri Public Service Commission Case No. CD-2005-0243

RESPONSE TO ORDER DIRECTING FILING

COMES NOW, Snappy Phone of Texas, Inc. d/b/a Snappy Phone and hereby files this Response to Order Directing Filing in connection with its Application for Cancellation of its Certificate of Service Authority (the "Application"), and shows the following:

1. On January 25, 2005, Snappy Phone of Texas, Inc. d/b/a Snappy Phone filed an application requesting that the Commission cancel the company's certificate of service authority. Specifically, Snappy Phone requested cancellation of its certificate to provide basic local telecommunications services granted to it in Case No. TA-2000-783. The company also requested cancellation of its tariff, Missouri P.S.C. Tariff No. 2. The Staff of the Commission filed its memorandum recommending that the Commission cancel the company's certificate. Staff informed the Commission that Snappy Phone was granted a certificate to provide interexchange telecommunications service and basic local service in Case No. TA-2000-372. Thereafter, the company's basic-local service area was expanded in Case No. TA-2000-783. Staff recommends that the Commission cancel the company's certificate to provide basic local as well as inter-exchange service. Snappy Phone only requested cancellation of its basic local service. Staff also recommends that the Commission cancel the company's tariffs, Missouri PSC Tariff No. 2 and Missouri PSC Tariff No. 1. Snappy Phone only requested cancellation of its Tariff No. 2.

2. On March 4, 2005, the Commission issued an Order Directing Filing, which requires that Snappy Phone file a pleading clarifying whether it wishes the Commission to cancel its Certificate to Provide Interexchange Telecommunications Services and its tariff, Missouri PSC Tariff No. 1.

3. Snappy Phone hereby represents to the Commission, that it wishes the Commission to cancel its Certificate to Provide Interexchange Telecommunications Services and its tariff, Missouri PSC Tariff No. 1.

WHEREFORE, on the basis of the Application, and as set forth in this Response to Order Directing Filing, Snappy Phone of Texas, Inc. d/b/a Snappy Phone respectfully requests that the Commission grant its Application for the Cancellation of Certificates of Service Authority to provide both basic local telecommunications services and interexchange telecommunication services, as well as Missouri PSC Tariffs No. 1 and 2.

Respectfully supmitted,

Lance J.M. Steinhart, Esq. Lance J.M. Steinhart, P.C. 1720 Windward Concourse, Suite 250 Alpharetta, Georgia 30005 (770) 232-9200 (Phone) (770) 232-9208 (Fax) <u>lsteinhart@telecomcounsel.com</u> (Email) GA Bar No. 678222

and

Judith A. Rau, Esq. Rau & Rau 119 E. Mill Street Waterloo, Illinois 62298 (618) 939-7186 Missouri Bar No. 24856

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing

Amendment by Interlineation to Application for the Cancellation of Certificate of Service

Authority Within the State of Missouri on the following parties, in accordance with the

Commission rules:

Office of the Public Counsel P. O. Box 7800 Jefferson City, MO 65102

General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Dated this 7th day of March , 2005.

Lance J.M. Steinhart Georgia Bar No. 678222

Lance J.M. Steinhart, P.C. 1720 Windward Concourse Suite 250 Alpharetta, Georgia 30005 (770) 232-9200 (770) 232-9208 (Fax) <u>lsteinhart@telecomcounsel.com</u> (Email)