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September 27, 1999

FILED

SEP 27 1999

Missouri Public
Service Commission

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Room 530
Truman State Office Building
Jefferson City Missouri 65101

Re: In the Matter of Alma Telephone Company's Filing to Revise Its Access
Service Tariff, PSC Mo. No. 2; Case No. TT-99-428 et al.

Dear Secretary Roberts:

Enclosed for filing in the above-referenced case please find an original and
fourteen copies of AT&T Wireless' Response to Motion to Compel.

Thank you in advance for your attention to this matter.

Sincerely,

LATHROP & GAGE L.C.

By:

Paul S. DeFord

PSD/jf
Enclosures

cc: Office of Public Counsel
All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION

STATE OF MISSOURI

FILED

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Missouri Public
Service Commission

In the Matter of Alma Telephone)
Company's Filing to Revise Its Access) Case No. TT-99-428, et al.
Service Tariff, PSC Mo. No. 2)

AT&T WIRELESS' RESPONSE TO MOTION TO COMPEL

COMES NOW AT&T Wireless Services, Inc. ("AWS") and responds to the Mid-Missouri Group's Motion to Compel Answers to Data Requests and states as follows:

1. On or about September 15, 1999, the Mid-Missouri Group filed a Motion to Compel Answers to Data Requests from AT&T Wireless. The Mid-Missouri Group alleges that over 20 days have elapsed from the date of service of data requests upon AWS and to date has received no answers, objections or responses.

2. By letter dated August 9, 1999, AWS objected to each of the Data Requests propounded by the Mid-Missouri Group (see attached Appendix A). AWS asserted therein that the data requests were overly broad and burdensome. The data requested is not routinely maintained and would require AWS to expend substantial resources to gather the subject information.

3. AWS has suggested that there is little disagreement amongst the parties as to the operative facts affecting this case. AWS continues to believe that the resources of the parties and ultimately the Commission would be better spent developing a stipulated set of facts and briefing the legal issues for submission to the Commission.

WHEREFORE, for all of the foregoing reasons AWS requests that the Mid-Missouri Group's Motion to Compel be denied.

Respectfully submitted,

LATHROP & GAGE, L.C.

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ATTORNEYS FOR AT&T WIRELESS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above and foregoing document was mailed, by U.S. mail, postage prepaid, to the following, being the attorneys of record at their addresses of record this 27th day of September, 1999:

Mr. Michael Staudt
Choctaw Telephone Company
P.O. Box 82
221 West Main
Halltown, MO 65664

Mr. Oral Glasco
Alma Telephone Co.
206 S. County Rd.
Alma, MO 64001

Mr. Ray Ford
NE Missouri Rural Telephone Company
Modern Telecommunications
Route 3, 718 S. West Street
Green City, MO 63545

Mr. William Biere
Chariton Valley Telephone Corp.
P. O. Box 470
Bucklin, MO 64631

Mr. Dave Jones
Mid-Missouri Telephone
P. O. Box 38
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Mr. Donald D. Stowell
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August 9, 1999

VIA FACSIMILE

Mr. Craig S. Johnson
Andereck, Evans, Milne,
Peace & Baumhoer
305 E McCarty, Third Floor
P. O. Box 1438
Jefferson City, Missouri, 65102

Re: Case No. TT-99-428 et al.

Dear Craig:

This correspondence is in response to your Data Requests received on August 2, 1999. As I indicated when we spoke the other day, AT&T Wireless Services, Inc. (AWS) objects to each of your Data Request because they are overly broad and burdensome.

AWS remains convinced that there is little, if any, disagreement between us as to the operative facts affecting this case. For that reason AWS suggests that we devote our time and resources toward development of a Stipulated Facts and then brief the legal issues for submission to the Commission. By proceeding in this manner we could hopefully avoid costly litigation and get a Commission decision resolving the underlying issues.

Please feel free to call if you wish to further discuss this matter.

APPENDIX A

May 14, 1999
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Very truly yours,

LATHROP & GAGE L.C.

By: 
Paul S. DeFord