

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Tariff Filing by Mo-)	
Kan Dial Company, Inc., to Establish a)	Case No. IT-2009-_____
15-day Due Date for Bills.)	Tariff File No. JI-2009-0656

MOTION TO SUSPEND

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. Mo-Kan Dial Company, Inc., is an incumbent local exchange telecommunications company. Mo-Kan is a small telephone company as defined by Section 392.230.4 RSMo Supp. 2008, because it serves fewer than twenty-five thousand access line in the state of Missouri.
2. On March 16, 2009, Mo-Kan submitted a revised tariff sheet designed to reduce the due date for a subscriber's bill from 21 days after the bill is rendered to 15 days after the bill is rendered. The revised tariff sheet bears a proposed effective date of April 16, 2009. The revised tariff sheet was submitted in Tariff File No. JI-2009-0656, which is attached hereto.
3. Commission rule 4 CSR 240-33.040(5) provides:

(5) If a telecommunications company does not expressly offer a preferred payment date plan, a customer shall have at least twenty-one (21) days from the rendition of a bill to pay the charges stated. If the charges remain unpaid for twenty-one (21) days from rendition of the bill such charges will be deemed delinquent.
4. Section 392.420 RSMo Supp. 2008 provides that where an alternative local exchange telecommunications company is authorized to provide local exchange telecommunications service in an incumbent local exchange telecommunications company's authorized service area, the incumbent local exchange telecommunications company may opt

into certain statutory and commission rule waivers, including a waiver of the Commission's billing standards rules.

5. In Case No. IE-2009-0158, Mo-Kan filed notification with the Commission that it elected to waive certain Commission rules and statutes, including 4 CSR 240-33.040(5).

6. A telecommunications company's instrumentalities, facilities, and charges shall be just and reasonable. Sections 392.200 RSMo Supp. 2008. A telecommunications company's regulations and practices shall be just and reasonable. Section 392.240.2 RSMo 2000. These statutes are not included in the list of statutes subject to waiver set forth in Section 392.240, and remain applicable to Mo-Kan.

7. Section 392.230.5 RSMo Supp. 2008 authorizes the Commission to suspend the operation of and to enter upon a hearing concerning the propriety of a regulation or practice proposed in a small telephone company's tariff filing.

8. In the Staff's opinion, Mo-Kan's proposal to reduce the due date for a subscriber's bill to 15 days after the bill is rendered is not just and reasonable.

WHEREFORE, the Staff requests the Commission to suspend, and set for hearing, Mo-Kan's tariff submission in File No. JI-2009-0656.

Respectfully submitted,

/s/ William K. Haas

William K. Haas

Deputy General Counsel

Missouri Bar No. 28701

Attorney for the Staff of the
Missouri Public Service Commission
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CERTIFICATE OF SERVICE

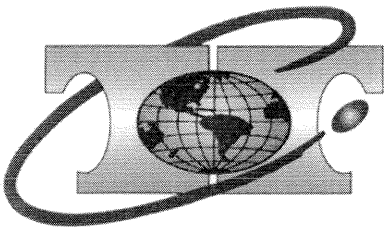
I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties listed below this 8th day of April, 2009.

Amanda Molina
505 Plaza Circle, Ste 200
Orange Park, FL 32073

Craig Johnson
1648A East Elm Street
Jefferson City, MO 65101

Lewis R. Mills, Jr.
Office of Public Counsel
P.O. Box 2230
200 Madison Street, Ste 650
Jefferson City, MO 65102

/s/ William K. Haas
William K. Haas



TOWNES TELECOMMUNICATIONS SERVICES CORPORATION

April 6, 2009

Colleen Dale
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Dear Ms. Dale:

Re: Local Exchange Tariff – PSC MO No. 2
MoKan Dial, Inc.

The accompanying tariff sheet issued by MoKan Dial, Inc. is sent to you for filing in the Company's Local Exchange Tariff PSC MO No. 2.

Sheet No.:

3rd Revised Sheet No. 4

Cancels Sheet No.:

2nd Revised Sheet No. 4

Pursuant to the authority granted by the Missouri Public Service Commission in Order No. IE-2009-0158, MoKan Dial, Inc. is changing the payment due date to fifteen (15) days after the bill is rendered.

It is desired that the tariff page accompanying this filing become effective April 16, 2009.

If you should have any questions or require additional information, please call me at (904) 688-0031 or you may reach me by email at amolina@townes.net.

Sincerely,

Amanda Molina

Amanda Molina
Supervisor of Product Development & Pricing

Enclosure

Mo-Kan Dial Company, Inc.

RULES AND REGULATIONS

1. The Telephone Company will furnish long distance service when it can secure suitable facilities and rights for construction and maintenance of necessary pole lines, wire and equipment, or suitable connections with other telephone companies.
2. Local exchange service is classified as business or residence based upon the character of usage. It is for use by the subscriber, his family, employees, associated and guests.
3. NEW SUBSCRIBER PAYMENTS: Applicants for service are required to pay one billing period rental in advance plus installation charge or service connection charge as the case may be.
4. BILLING AND PAYMENT
 - a. The subscriber shall receive a bill during each billing period. Failure to receive a bill does not relieve the subscriber of the responsibility of payment for telephone service.
 - b. All bills for local, toll or miscellaneous service are due and payable fifteen (15) + days after rendered.
 - c. Demand for payment of toll charges may be made once a bill is considered delinquent, and after written notice had been provided ten (10) days by mail or ninety-six (96) hours by hand delivery to the customer.

* Indicates new rate or text
+ Indicates change

Issued: 03-16-09

Effective: 04-16-2009

Jane Prettyman
General Manager
112 South Broadway
Louisburg, KS 66053

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AFFIDAVIT

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Sara Burger, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that the facts stated in the accompanying Motion to Suspend are true and correct to the best of his/her knowledge.

Sara Burger

Subscribed and sworn to before me this 8th day of April 2009.

Carla K. Schnieders
Notary Public

My commission expires August 25, 2012

CARLA K. SCHNIEDERS
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: August 25, 2012
Commission Number: 08533187