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January 25, 2000

FILED

JAN 26 2000

**Missouri Public
Service Commission**

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, Missouri 65101

Re: Case Nos. TC-2000-325, TC-2000-401, TC-2000-402

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and 14 copies of Southwestern Bell Telephone Company's Motion to Consolidate and to Schedule an Early Prehearing Conference.

Please stamp "Filed" on the extra copy and return the copy to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

A handwritten signature in black ink, appearing to read "Leo M.", written over the typed name.

Leo J. Bub

Enclosure

cc: Attorneys of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JAN 26 2000

Missouri Public
Service Commission

Southwestern Bell Telephone Company's)
Complaint Against Mid-Missouri)
Telephone Company for Blocking)
Southwestern Bell's 800 MaxiMizer Traffic)
and Request for an Order Requiring)
Mid-Missouri to Restore the Connection.)

Case No. TC-2000-325

Southwestern Bell Telephone Company's)
Complaint Against Goodman and Seneca)
Telephone Companies and Request for an)
Order Prohibiting Them from Cutting Off)
Southwestern Bell's 800 MaxiMizer Traffic.)

Case No. TC-2000-401

Southwestern Bell Telephone Company's)
Complaint Against Chariton Valley)
Telephone Corporation and Request for an)
Order Prohibiting Chariton Valley from)
Cutting Off Southwestern Bell's 800)
MaxiMizer Traffic.)

Case No. TC-2000-402

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
MOTION TO CONSOLIDATE AND TO
SCHEDULE AN EARLY PREHEARING CONFERENCE**

Southwestern Bell Telephone Company respectfully requests the Missouri Public Service Commission to consolidate the Complaints Southwestern Bell has filed against Mid-Missouri Telephone Company, Goodman and Seneca Telephone Companies and Chariton Valley Telephone Corporation (Respondents); and to schedule an early prehearing conference. In support of its Motion, Southwestern Bell states:

1. Southwestern Bell filed Complaints against Respondents for violating a Commission Order by blocking calls from Respondents' exchanges to Southwestern Bell's 800 MaxiMizer customers and requested the Commission issue an order requiring Respondents to

restore the connections. Southwestern Bell understands that each of the Respondents has now been served with a copy of Southwestern Bell's Complaint by the Commission.

2. The cases in which Southwestern Bell's Complaints against Respondents have been docketed should be consolidated because all three of the cases present common questions of law and fact. See, Missouri Rule of Civil Procedure 66.01(b). In each of the cases, the individual Respondent has cut off calls from its customers to Southwestern Bell's 800 MaxiMizer customers. The Complaints Southwestern Bell filed against each of the Respondents are nearly identical. And the relief Southwestern Bell seeks from the Commission in each case is identical.

3. Counsel for Southwestern Bell has discussed consolidating these three Complaints with counsel for each of the Respondents. All concurred that consolidating these cases would be the most efficient way to handle them and consented to consolidation.

4. Counsel for Southwestern Bell also discussed with Respondents' counsel the possibility of submitting these cases to mediation. All were of the view that these cases most likely would not be mediable.

5. Given Southwestern Bell's interest in having traffic to its 800 MaxiMizer customers promptly restored, Southwestern Bell through this Motion requests the Commission to schedule an early prehearing conference so that this case can commence. Southwestern Bell's counsel discussed this request with counsel for each of the Respondents and neither had any objection.

WHEREFORE, Southwestern Bell respectfully requests the Commission to issue an order (1) consolidating case Nos. TC-2000-325, TC-2000-401 and TC-2000-402; and (2) scheduling an early prehearing conference for this consolidated proceeding.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY



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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by first-class, postage prepaid, U.S. Mail on January 25, 2000.



Leo J. Bub

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