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January 10, 2000

FILED²

JAN 10 2000

Missouri Public
Service Commission

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

Re: TC-2000-402

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies each of Chariton Valley's Motion to Dismiss Complaint, an alternative Answer to the Complaint in the event the Commission does not rule upon the Motion to Dismiss within thirty days.

Also, please be advised that Chariton Valley is willing to have its case consolidated with TC-2000-325, and any other pending "maximizer 800 complaint" cases. Please be further advised that Chariton Valley is willing to attempt to mediate this complaint.

A copy of this letter and a copy of the enclosures have been served upon all attorneys of record. Thank you for seeing this filed.

Sincerely,

Craig S. Johnson
by *L. L. M. Lue*
Craig S. Johnson

CSJ/dl

cc: Leo Bub
Dan Joyce
Martha Hogarty
Bill Biere
Trip England

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JAN 10 2000

Missouri Public
Service Commission

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

Case No. TC-2000-402

ANSWER TO COMPLAINT

COMES NOW Chariton Valley Telephone Corporation, pursuant to 4 CSR 240-2.070(a), in the alternative to the Motion to Dismiss previously filed, and, in the event said Motion to Dismiss is not granted, files this Answer within thirty days of service of the complaint upon Chariton Valley Telephone Corporation. Chariton Valley responds to the specific paragraphs of Southwestern Bell's complaint, as follows:

1. This paragraph is admitted except that it is not admitted to Southwestern Bell as authorized to originate intraLATA toll traffic from and within the exchanges of Chariton Valley Telephone Corporation since termination of the primary toll carrier plan in TO-99-254.

2. Admitted.

3. Admitted.

4. It is stated that the Report and Order, as augmented by subsequent decisions of the Commission in that docket, speak for themselves. Chariton Valley Telephone Corporation's Motion to Dismiss this complaint is hereby incorporated herewith by reference as if fully set forth herein. It is specifically denied that this Report

and Order authorizes Southwestern Bell to originate MaxiMizer traffic in Chariton Valley exchanges on a Feature Group C basis.

5. It is admitted there were prior conversations, but the date or substance is not admitted to be limited to SWB's allegation in this paragraph.

6. Chariton Valley is without sufficient information to form a specific response to the allegations of this paragraph at this time.

7. Admitted.

8. Admitted.

9. Admitted.

10. It is admitted that post PTC Plan termination discussions between some LEC entities have occurred. It is denied that there is any Commission sanction of these meetings, or that any "committee" with any authority to do anything is meeting.

11. Denied.

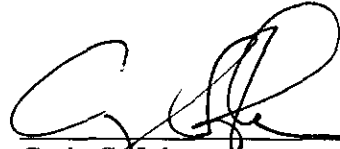
12. Denied.

13. Denied.

WHEREFORE, having fully answered Southwestern Bell's complaint, Chariton Valley Telephone respectfully requests that said complaint be dismissed, that said complaint be denied, together with such other and further relief as the Commission deems appropriate.

ANDERECK, EVANS, MILNE
PEACE & JOHNSON, L.L.C.

By:




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ATTORNEYS FOR
CHARITON VALLEY
TELEPHONE CORP.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was mailed, U. S. Mail, postage pre-paid, this 10 day of January, 2000, to Dan Joyce, MoPSC General Counsel, and Martha Hogerty, Office of Public Counsel, and Leo Bub.


Craig S. Johnson