LAW OFFICES

#### BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65 I 02-0456

AREA CODE 573 TELEPHONE 635-7166 FACSIMILE 635-0427

PUBLIC SERVICE COMMISSION

April 29, 1997

Mr. Cecil I. Wright **Executive Secretary** Missouri Public Service Commission P. O. Box 360 Jefferson City, Missouri 65102

Case No. TW-97-333 Re:

Dear Mr. Wright:

DAVID V.G. BRYDON

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND III

SARAH J. MAXWELL CHARLES E. SMARR MARK G. ANDERSON DEAN L. COOPER CHRISTINE J. EGBARTS TIMOTHY T. STEWART

JOHNNY K. RICHARDSON GARY W. DUFFY PAUL A. BOUDREAU SONDRA B. MORGAN

Enclosed for filing in the above-referenced matter, please find the Response of the Small Telephone Company Group to CompTel's Motion for Extension of Time Within Which to File Rebuttal Testimony.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel. If there are any questions, please direct them to the undersigned. I thank you in advance for your attention to and cooperation in this matter.

Sincerely,

WRE/da Enclosure

Office of Public Counsel cc:

> Paul S. DeFord Stephen Morris

Paul Lane

Linda Gardner

Mark Comley Craig Johnson

Carl Lumley

James Stroo Julie Grimaldi

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

OF THE STATE OF MISSOURI		FILE	
In the matter of an Investigation into the Provision of Community Optional Calling Service in Missouri.	) ) )	Case No. TW-97-333	APR 29 1997  PUBLIC SERVICE COMMISSION

# RESPONSE OF THE SMALL TELEPHONE COMPANY GROUP TO COMPTEL'S MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE REBUTTAL TESTIMONY

Comes now the Small Telephone Company Group ("STCG"), members of which are listed on Attachment "A," and for its response to CompTel's Motion for Extension of Time Within Which to File Rebuttal Testimony, states to the Missouri Public Service Commission (Commission) as follows:

- 1. CompTel seeks to extend the deadline for filing rebuttal testimony in the above-captioned matter from May 2 to May 12, 1997, on the grounds that its witness will be involved in a Technical Conference concerning the State Universal Service Fund (Case No. TO-97-367) which is currently scheduled for Wednesday, April 30 through Friday, May 2, 1997. CompTel suggests that since there currently pends before the Commission a motion by Southwestern Bell Telephone Company (SWBT) to allow SWBT to file supplemental rebuttal testimony on May 12, 1997, that CompTel be extended the same privilege.
- 2. The STCG has previously filed a response and objection to SWBT's proposal to extend the filing of SWBT's rebuttal testimony to May 12, 1997. One of the primary reasons that the STCG objects to the extension is that it will severely prejudice its ability to review this rebuttal testimony and prepare a response and/or cross examination with respect thereto by the commencement of the hearing on May 15, 1997. The STCG asserts the same reasoning is

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applicable to CompTel's motion and therefore objects to it as well. Allowing CompTel to file its rebuttal testimony on May 12, 1997 will prejudice the STCG in its ability to adequately review and respond to such rebuttal testimony. Moreover, the STCG notes that its witness, Robert C. Schoonmaker, and possibly other parties' witnesses, will also be actively involved in the Universal Service Fund Technical Conference, but under CompTel's proposal, they would still be required to file their rebuttal testimony on May 2, 1997.

WHEREFORE, in light of the foregoing, the STCG respectfully requests the Commission to deny CompTel's Motion for Extension of Time Within Which to File Rebuttal Testimony and for such other orders as are appropriate in the circumstances.

Respectfully submitted,

W. R. England III

Mo. #23975

BRYDON, SWEARENGEN & ENGLAND P.C.

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65101-0456

Attorneys for

The Small Telephone Company Group

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was mailed, United States Mail, postage prepaid, this 29 day of April, 1997, to:

Cherlyn McGowan Missouri Public Service Commission P.O. Box 360 Jefferson City, Missouri 65102

Paul S. DeFord Charles W. McKee Lathrop & Gage 2345 Grand Blvd., Suite 2500 Kansas City, Missouri 64108

Stephen Morris MCI Telecommunications Corp. 701 Brazos, Suite 600 Austin, Texas 78701

Paul G. Lane
Diana J. Harter
Leo J. Bub
Southwestern Bell Telephone Company
100 N. Tucker, Room 630
St. Louis, Missouri 63101-1976

Linda K. Gardner United Telephone Company of Missouri 5454 W. 110th Street Overland Park, Kansas 66211

Mark W. Comley Newman, Comley & Ruth P.O. Box 537 Jefferson City, Missouri 65102 Craig S. Johnson Andereck, Evans et al. 301 East McCarty, Box 1438 Jefferson City, Missouri 65102-1438

Carl J. Lumley Leland B. Curtis Curtis, Oetting, et al. 130 S. Bemiston, Suite 200 St. Louis, Missouri 63105

James C. Stroo Associate General Counsel GTE Telephone Operations 1000 GTE Drive, Box 307 Wentzville, Missouri 63385-0307

Julie E. Grimaldi Sprint Communications Company 8140 Ward Parkway, 5E Kansas City, Missouri 64114

Michael Dandino Office of the Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

W.R. England III

### **ATTACHMENT A**

ALLTEL Missouri Inc. Bourbeuse Telephone Company **BPS** Telephone Company Cass County Telephone Company Citizens Telephone Company of Higginsville, Missouri, Inc. Craw-Kan Telephone Cooperative, Inc. Ellington Telephone Company Fidelity Telephone Company Goodman Telephone Company, Inc. Grand River Mutual Telephone Corporation Green Hills Telephone Corp. Holway Telephone Company Kingdom Telephone Company KLM Telephone Company Lathrop Telephone Company McDonald County Telephone Company Mark Twain Rural Telephone Company Miller Telephone Company New Florence Telephone Company New London Telephone Company Orchard Farm Telephone Company Oregon Farmers Mutual Telephone Co.

Stoutland Telephone Company