

ANDERHECK, EVANS, MILNE, PEACE & BAUMHOER

ATTORNEYS AT LAW

305 EAST McCARTY STREET

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438

TELEPHONE 573-634-3422

FAX 573-634-7822

EUGENE E. ANDERHECK

TERRY M. EVANS

ERWIN L. MILNE

JACK PEACE

PATRICK A. BAUMHOER

CRAIG S. JOHNSON

RODRIC A. WIDGER

GEORGE M. JOHNSON

BEVERLY J. FIGG

CARL E. LIPPELMAN

WILLIAM S. LEWIS

VICTOR S. SCOTT

LESLEY A. RENFRO

COREY K. HERRON

MATTHEW M. KROHN

DAVID R. MERCER

LANETTE R. GOOCH

MATTHEW D. TURNER

MARVIN L. SHARP

OF COUNSEL

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

June 18, 1999

Mr. Dale Hardy Roberts
Chief Administrative Law Judge
Missouri Public Service Commission
Post Office Box 360
Jefferson City, MO 65102

FILED

JUN 21 1999

Re: Case Nos. TT-99-428, TT-99-429, TT-99-430,
TT-99-431, TT-99-432, TT-99-433

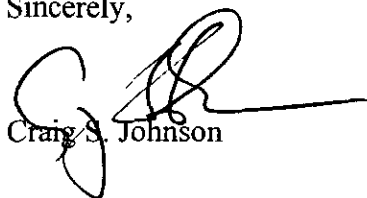
Missouri Public
Service Commission

Dear Dale:

Enclosed for filing please find an original and 15 copies of the Mid-Missouri Group's Response To Show Cause Order. A copy of same has been mailed this date to all counsel of record.

Thank you for seeing this filed.

Sincerely,


Craig S. Johnson

CSJ:skl

Enclosure

cc: Office of Public Counsel
General Counsel
Paul S. DeFord
Jeanne A. Fischer
Charles W. McKee
W. R. England, III / Brian T. McCartney
Paul Lane / Leo Bub
Anthony Conroy / Katherine Swaller
Mid-Missouri Managers

TRENTON OFFICE
9th AND WASHINGTON
P.O. BOX 547
TRENTON, MISSOURI 64683-0547
660-359-2244
FAX 660-359-2116

SPRINGFIELD OFFICE
1111 S. GLENSTONE
P.O. BOX 4929
SPRINGFIELD, MISSOURI 65808-4929
417-864-6401
FAX 417-864-4967

PRINCETON OFFICE
207 NORTH WASHINGTON
PRINCETON, MISSOURI 64673
660-748-2244
FAX 660-748-4405

SMITHVILLE OFFICE
119 E. MAIN STREET
P.O. BOX 654
SMITHVILLE, MISSOURI 64089
816-532-3895
FAX 816-532-3899

FILED

JUN 21 1999

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Alma Telephone Company's Filing to Revise its Access Service Tariff, P.S.C. Mo. No. 2.)	Case No. TT-99-428 Tariff No. 9900658
In the Matter of MoKan Dial, Inc.'s Company's Filing to Revise its Access Service Tariff, P.S.C. Mo. No. 2.)	Case No. TT-99-429 Tariff No. 9900656
In the Matter of Mid-Missouri Telephone Company's Filing to Revise its Access Service Tariff, P.S.C. Mo. No. 2.)	Case No. TT-99-430 Tariff No. 9900712
In the Matter of Choctaw Telephone Company's Filing to Revise its Access Service Tariff, P.S.C. Mo. No. 2.)	Case No. TT-99-431 Tariff No. 9900667
In the Matter of Chariton Valley Telephone Company's Filing to Revise its Access Service Tariff, P.S.C. Mo. No. 2.)	Case No. TT-99-432 Tariff No. 9900657
In the Matter of Peace Valley Telephone Company's Filing to Revise its Access Service Tariff, P.S.C. Mo. No. 2.)	Case No. TT-99-433 Tariff No. 9900655

RESPONSE TO SHOW CAUSE ORDER

COME NOW Alma Telephone, MoKan Dial, Inc., Mid-Missouri Telephone, Choctaw Telephone, Chariton Valley Telephone, and Peace Valley Telephone, and states the following in response to that Show Cause Order, as to why we have not complied with the Commission Order of May 11, 1999, and why this case should not be dismissed:

1. Other than the June 16 Show Cause Order itself, the undersigned has not received service copies of any order entered in any of these dockets, either the orders

suspending tariffs, or the alleged May 11, 1999 Order consolidating cases and establishing a date for filing a procedural schedule. In monitoring new orders on the Commission's web page, the undersigned has been successful in obtaining non-service copies of orders suspending tariffs. However, upon receipt of the Commission's June 16 Show Cause Order, the undersigned went to the Commission web page and was unable to find any such May 11, 1999 Order.


2. At the April 29, 1999 Pre-hearing conference, it was determined by the parties to attempt to prepare a stipulation detailing how different types of calls are originated, transported, terminated, recorded, routed, billed, etc. On May 3rd the undersigned, sent to all counsel of record a very rudimentary, introductory draft of the outline of the factual stipulation. No response was received thereto, whatsoever, and to my knowledge none of the counsel have had an opportunity to discuss the status of this case due to the time and effort devoted to the PTC Plan, intraLATA Toll Dialing Parity Implementation Plans and MOUSF proceedings which have largely taken up the last half of May and the first half of June.

3. In the past, Staff has normally taken the lead in drafting proposed procedural schedules, stipulations, but no such drafts have been received.

4. In order to get this case back on point, besides obtaining a copy of the May 11, 1999 Order, if one exists, the undersigned would respectfully request that a telephonic supplemental pre-hearing conference be conducted. The undersigned is not sure that the tentative dates selected at the April 29 pre-hearing conference to have a stipulation prepared, filed, briefed and presented to the Commission are viable any longer.

WHEREFORE, on the basis of the foregoing, the undersigned respectfully requests that the above be accepted as compliance with the Commission's Show Cause Order, that this case should not be dismissed, and further that the Commission schedule a supplemental telephonic pre-hearing conference in which to revisit the schedule which will be required in order to present this case on the most expedited and simplified basis possible.

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

By 
Craig S. Johnson
Missouri Bar No. 28179
Hawthorn Center - Third Floor
305 East McCarty Street
Post Office 1438
Jefferson City, Missouri 65102

Telephone: (573) 634-3422
Facsimile: (573) 634-7822

ATTORNEYS FOR
THE MID-MISSOURI GROUP