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May 28, 2002

Mr. Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: **CO-2002-1078**

Dear Mr. Roberts:

Enclosed for filing on behalf of the Small Telephone Company Group ("STCG"), please find an original and eight (8) copies of a Request of the Small Telephone Company Group for Additional Time to Respond to the Office of Public Counsel's Motion to Establish Case and to Conduct an Investigation.

Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Sondra B. Morgan

SBM/Tar
Enclosure

cc: General Counsel
Michael F. Dandino

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Investigation of the)
Status of Prepaid Local Service Providers)
as Alternative Local Exchange Competitors))
Under Section 392.245, RSMo.)

Case No. CO-2002-1078

REQUEST OF THE SMALL TELEPHONE COMPANY GROUP
FOR ADDITIONAL TIME TO RESPOND TO THE OFFICE OF PUBLIC COUNSEL'S
MOTION TO ESTABLISH CASE AND TO CONDUCT AN INVESTIGATION

Comes now the Small Telephone Company Group ("STCG") and for its Request for Additional Time to Respond to the Office of Public Counsel's Motion to Establish Case and to Conduct an Investigation ("Motion") states to the Missouri Public Service Commission ("Commission") as follows:

1. On May 16, 2002, the Office of Public Counsel ("Public Counsel") filed its Motion with the Commission requesting that the Commission "establish a case and ... conduct an investigation into the status of prepaid local service providers as it relates to the existence of an alternative local exchange competitor that offers basic local service in any exchange of an incumbent local exchange company's service area under Section 392.2345, RSMo 2000, the price cap statute."

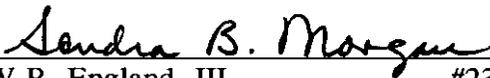
2. Commission rule 4 CSR 240-2.080(15) states that "[p]arties shall be allowed not more than ten (10) days from the date of the filing in which to respond to any pleading unless otherwise ordered by the Commission." Thus, any response to Public Counsel's Motion would be due on May 26, a Sunday. Commission rule 4 CSR 240-2.050 states that when the last day of a period of computation falls on a Saturday, Sunday or legal holiday, the period will run until the end of the next day which is not a Saturday, Sunday or legal holdiai. Since Monday May 27 was

a legal holiday, any response to Public Counsel's Motion would be due today, May 28.

3. Rule 4 CSR 240-2.080(3)(A) states that the period may be enlarged before the expiration of the period originally prescribed. Because of the importance of the issue raised by Public Counsel in its Motion, the intervening holiday and the difficulty in notifying the members of the STCG and receiving responses from them regarding this Motion, the STCG finds it necessary to request additional time to respond to Public Counsel's Motion. The STCG requests that the Commission grant it until at least Friday, May 31 to file a response.

For all the reasons above, the STCG respectfully requests that the Commission grant its request for additional time to respond to Public Counsel's Motion.

Respectfully submitted,


W.R. England, III #23975
Sondra B. Morgan #35482
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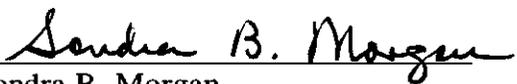
**Attorneys for the Small Telephone Company
Group**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 28th day of May, 2002, to the following parties:

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Michael F. Dandino
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102


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