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April 23, 1997

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

Re: Case No. TW-97-333

Dear Mr. Wright:

Enclosed please find an original and fourteen copies of the Response of the Small Telephone Company Group to Southwestern Bell Telephone Company's Motion to Shorten Time for Discovery Responses or For Leave to Supplement Rebuttal Testimony. Copies of the Response are being provided to parties of record.

If you have any questions regarding the attached, please direct them to me. Otherwise, I thank you in advance for your cooperation in this matter.

Sincerely,


W.R. England, III

WRE/da
Enclosure

cc: James Stroo
Craig Johnson
Linda Gardner
Julie Grimaldi
Paul Lane
Carl Lumley
Paul Gardner
Mark Comley
Paul DeFord

FILED
APR 23 1997
MISSOURI
PUBLIC SERVICE COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
APR 23 1997
MISSOURI
PUBLIC SERVICE COMMISSION

In the matter of an Investigation)
into the Provision of Community)
Optional Calling Service in) Case No. TW-97-333
Missouri.)

RESPONSE OF THE
SMALL TELEPHONE COMPANY GROUP
TO SOUTHWESTERN BELL TELEPHONE COMPANY'S
MOTION TO SHORTEN TIME FOR DISCOVERY RESPONSES
OR FOR LEAVE TO SUPPLEMENT REBUTTAL TESTIMONY

Comes now the Small Telephone Company Group ("STCG"), members of which are listed on Attachment "A," and for its response to Southwestern Bell Telephone Company's (SWBT) Motion to Shorten Time for Discovery Responses or for Leave to Supplement Rebuttal Testimony (Motion) states to the Missouri Public Service Commission (Commission) as follows:

1. SWBT's Motion should be denied because SWBT has not demonstrated that the data requests to which it seeks expedited responses could not have been sent earlier in the proceeding. In fact, all of the data requests constituting SWBT's Third Set of Data Requests could have been propounded at any time after initiation of this docket (i.e., March 7, 1997). Moreover, SWBT's failure to propound those data requests in a timely fashion will result in prejudice to the STCG. First, the STCG is prejudiced by the fact that if the Motion is granted, it will be required to expend substantial amounts of time and effort to respond to these requests in an expedited fashion thus taking away from the STCG's time to prepare rebuttal testimony as well as prepare for hearing. Second, if SWBT's alternative request for relief is granted (i.e., leave to file rebuttal testimony approximately two days before commencement of the hearing), the STCG will be prejudiced because it will not have an adequate opportunity to review and

respond to that testimony or prepare meaningful cross examination (if permitted). Accordingly, SWBT's failure to propound these data requests in a timely manner requires denial of its Motion.

2. Second, the Motion should also be denied because it only permits an answer to its data requests and does not contemplate or allow for the possibility that the STCG may have an objection to same. Indeed, the data requests propounded by SWBT (as part of its Third Set of Data Requests) seek highly confidential, customer specific information which does not appear to be relevant to the instant proceeding nor are they likely to lead to the discovery of relevant information. Thus, to the extent SWBT's Motion to Shorten Time for Discovery Response attempts to "preempt" the legitimate right of the STCG to object to the data requests, it must also be denied.

WHEREFORE, in light of the foregoing, the STCG respectfully requests that the Commission deny SWBT's Motion to Shorten Time for Discovery Responses or Leave to File Supplemental Rebuttal Testimony and for such other orders as are appropriate in the circumstances.

Respectfully submitted,



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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 mailed, United States Mail, postage prepaid, this 23rd day of April, 1997, to:

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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