



*Commissioners*

SHEILA LUMPE  
Chair

HAROLD CRUMPTON

CONNIE MURRAY

ROBERT G. SCHEMENAUER

M. DIANNE DRAINER  
Vice Chair

## Missouri Public Service Commission

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://www.ecodev.state.mo.us/psc/>

March 28, 2000

BRIAN D. KINKADE  
Executive Director

GORDON L. PERSINGER  
Director, Research and Public Affairs

WESS A. HENDERSON  
Director, Utility Operations

ROBERT SCHALLENBERG  
Director, Utility Services

DONNA M. KOLILIS  
Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

FILED<sup>3</sup>

MAR 28 2000

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

Missouri Public  
Service Commission

**RE: Case No. TA-2000-324**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **STAFF'S RESPONSE TO ORDER REQUESTING RESPONSE**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Bruce H. Bates  
Assistant General Counsel  
(573) 751-7434  
(573) 751-9285 (Fax)

BB/df  
Enclosure  
cc: Counsel of Record

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

**FILED<sup>3</sup>**

MAR 28 2000

Missouri Public  
Service Commission

In the Matter of the Application of 2nd )  
Century Communications, Inc. for a )  
Certificate of Service Authority to Provide )  
Competitive Resold Intrastate )  
Interexchange Telecommunications )  
Services and Non-Switched Basic )  
Telecommunications Services Within the )  
State of Missouri. )

Case No. TA-2000-324

**STAFF'S RESPONSE TO ORDER REQUESTING RESPONSE**

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and for its *Response to Order Requesting Response* states to the Commission as follows:

2<sup>nd</sup> Century's application in the above case was intended to result in the granting of a certificate of authority to offer interexchange telecommunications services and local exchange telecommunications (nonswitched, e.g. dedicated private line) services. 2<sup>nd</sup> Century later submitted a tariff that was incorporated into the certification process.

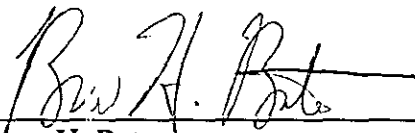
The *Staff Recommendation* consists of two pages of which the first page deals primarily with the application for certification and the second with the tariff. In this case, 2<sup>nd</sup> Century specifically applied for authority to offer interexchange services and local nonswitched (dedicated private line) services, hence, both boxes on the first page were checked. 2<sup>nd</sup> Century

did not choose to tariff the assumed soon-to-be-certificated authority by including required private line text and individual case base pricing language, therefore, Staff left unchecked the appropriate private line items on the second page of the *Staff Recommendation*. Staff has not made contradictory recommendations: 2<sup>nd</sup> Century wishes to have authority to offer nonswitched local services but does not wish to currently implement that authority.

WHEREFORE, Staff prays that the Commission accept its *Response to Order Requesting Response*. Staff further prays that the Commission make whatever other orders and judgments appear to it to be just and proper in this cause.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

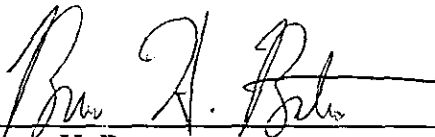


Bruce H. Bates  
Assistant General Counsel  
Missouri Bar No. 35442

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7434 (Telephone)  
(573) 751-9285 (Fax)

### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 28th day of March 2000.



Bruce H. Bates

Service List for  
Case No. TA-2000-324  
March 28, 2000

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Mark W. Comley  
Newman, Comley & Ruth  
601 Monroe St.  
Jefferson City, MO 65102