

Roger Wilson Governor

Office of the Public Counsel

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November 13, 2000

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

Re: Exop of Missouri, Inc.,

Case No. TA-2001-251

FILED²
NOV 1 3 2000

Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case, please find the original and 8 copies of the **Request for Hearing.** I have on this date mailed, faxed, and/or hand-delivered the appropriate number of copies to all counsel of record. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

ery truly yours,

Mikhael F. Dandino Senior Public Counsel

MFD:kh

cc:

Counsel of Record

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the matter of the Application of Exop of)	Service
Missouri, Inc. for designation as a)	1,Ce C
telecommunications company carrier)	Case No. TA-2001-251
eligible for Federal Universal Service)	
support pursuant to Section 254 of the)	
Telecommunications Act of 1996)	

REQUEST FOR HEARING

COMES NOW the Office of the Public Counsel respectfully requests an evidentiary hearing in this case. Public Counsel suggests that proceedings for this designation of an eligible carrier for purposes of receiving Federal and state universal service funding should be made based on an evidentiary record or (at the least) on a stipulated set of relevant facts and a stipulation of all parties that the carrier has adduced facts sufficient to demonstrate that it complies with the eligibility requirements in the Federal Telecommunications Act of 1996.

For these reasons, Public Counsel requests an evidentiary hearing.

Respectfully submitted,

Office of the Public Counsel

By:

Michael F. Dandino (24590)

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CERTFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was mailed, faxed or hand-delivered, this 13th day of November, 2000 to the following:

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

Kristine Becker Spencer, Fane, Britt & Browne, L.L.P. 1000 Walnut Street, Suite 1400 Kansas City, MO 64106-2140 W. R. England, III/Sondra B. Morgan Brydon, Swearengen & England P. O. Box 456 Jefferson City, MO 65102-0456