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Service Commission

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re: Tari Christ et al. v. Southwestern Bell Telephone Company, L.P.,

d/b/a Southwestern Bell Telephone Company

Complaint filed August 27, 2004

Dear Judge Roberts:

ROBERT K. ANGSTEAD

ROBERT J. BRUNDAGE

CATHLEEN A. MARTIN

STEPHEN G. NEWMAN

MARK W. COMLEY

JOHN A. RUTH

The staff of the Data Center brought to my attention that one of the complaining parties in the complaint referred to above changed his business name. Specifically, Bob Lindeman, who was certificated and doing business as Lindeman Communications, acquired Commission approval to change the name of his firm to Lind-Comm, LLC. I was advised that the complaint will not be further processed until the proper name of this complainant is reflected in the complaint.

I am enclosing an original and five copies of an amendment by interlineation to the complaint to make this correction. I elected to use interlineation to avoid the refiling of the entire complaint. The amendment alters the caption of the complaint and paragraph 13. An exhibit is also added and it is labeled Exhibit 18.

I am also enclosing corrected pages 1 and 4 of the complaint. They reflect Mr. Lindeman's change of name and the addition of the exhibit.

It is also my understanding that the Data Center staff have already confirmed that each named complainant is a certificated payphone provider in the state of Missouri. I hope that with this filing the processing of the complaint can continue.

If there are any questions about this filing, please do not hesitate to contact me. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

Bv

Mark W Comley

Enclosure

cc: Office of Public Counsel

General Counsel's Office

Lin Harvey



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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AMENDMENT BY INTERLINEATION TO COMPLAINT

Come now Complainants, by and through their attorneys, and pursuant to 4 CSR 240-2.080(14) hereby file this amendment by interlineation to their Complaint against the Respondent:

1. That part of the caption setting out the names of the complaining parties is amended to reflect a change in the business name of one complainant, specifically Bob Lindeman, d/b/a Lindeman Communications. The Commission approved a change in the name of this complainant to Lind-Comm, LLC. The pertinent part of the caption shall hereafter read as follows:

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Tari Christ, d/b/a ANJ Communications,)	
Bev Coleman, an Individual, Commercial)	
Communication Services, L.L.C., Community)	
Payphones, Inc., Com-Tech Resources, Inc.,)	
d/b/a Com-Tech Systems, Coyote Call, Inc.,)	
William J. Crews, d/b/a Bell-Tone Enterprises,)	
Davidson Telecom LLC, Evercom Systems, Inc.,)	
Harold B. Flora, d/b/a American Telephone)	Case No
Service, Illinois Payphone Systems, Inc.,)	
JOLTRAN Communications Corp., Lind-Comm,)	

¹ Bold face in the caption denotes the change from original complaint.

L.L.C., John Mabe, an Individual, Midwest)
Communication Solutions, Inc., Missouri)
Telephone & Telegraph, Inc., Jerry Myers, an Individual,)
Pay Phone Concepts, Inc., Jerry Perry, an Individual,)
PhoneTel Technologies, Inc., Craig D. Rash, an Individual,)
Sunset Enterprises, Inc., Telaleasing Enterprises, Inc.,)
Teletrust, Inc., Tel Pro, Inc., Toni M. Tolley, d/b/a)
Payphones of America North, Tom Tucker, d/b/a	Ì
Herschel's Coin Communications Company,	Ĺ
HKH Management Services, Inc.,	Ĺ
, ,	í
Complainants)

- 2. Paragraph 13 of the Complaint is amended to read hereafter as follows:
- 13. Lind-Comm, L.L.C. (Lind-Comm) is a Missouri limited liability company and is authorized to provide private pay telephone service in the State of Missouri. Lind-Comm's Certificate of Good Standing in the State of Missouri is attached hereto as Exhibit 18.
- 3. Except as set forth above, the remainder of the Complaint is unaltered by this amendment.

Respectfully submitted,

Mark W. Comley

MBE# 2/8847

NEWMAN, COMLEY & RUTH P.C.

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P.O. Box 537

Jefferson City, Missouri 65102-0537

573/634-2266

573/636-3306 FAX

comleym@ncrpc.com

Attorneys for Complainants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 15th day of September, 2004, to General Counsel's Office at gencounsel@psc.state.mo.us; Office of Public Counsel at opcservice@ded.state.mo.us.

Mark W.\Comley

STATE OF MISSOUR



Matt Blunt Secretary of State

CORPORATION DIVISION CERTIFICATE OF GOOD STANDING

I, MATT BLUNT, Secretary of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

LIND-COMM, LLC LC0525712

was created under the laws of this State on the 11th day of June, 2003, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 15th day of September, 2004

Secretary of State

Certification Number: 7018025-1 Reference:

Verify this certificate online at http://www.sos.mo.gov/businessentity/verification



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Tari Christ, d/b/a ANJ Communications,)
Bev Coleman, an Individual, Commercial)
Communication Services, L.L.C., Community)
Payphones, Inc., Com-Tech Resources, Inc.,)
d/b/a Com-Tech Systems, Coyote Call, Inc.,)
William J. Crews, d/b/a Bell-Tone Enterprises,)
Davidson Telecom LLC, Evercom Systems, Inc.,)
Harold B. Flora, d/b/a American Telephone) Case No
Service, Illinois Payphone Systems, Inc.,)
JOLTRAN Communications Corp., Lind-Comm, L.L.C.,)
John Mabe, an Individual, Midwest Communication)
Solutions, Inc., Missouri Telephone & Telegraph,)
Inc., Jerry Myers, an Individual, Pay Phone)
Concepts, Inc., Jerry Perry, an Individual, PhoneTel)
Technologies, Inc., Craig D. Rash, an Individual,)
Sunset Enterprises, Inc., Telaleasing Enterprises, Inc.,)
Teletrust, Inc., Tel Pro, Inc., Toni M. Tolley, d/b/a)
Payphones of America North, Tom Tucker, d/b/a)
Herschel's Coin Communications Company,)
HKH Management Services, Inc.,)
)
Complainants,)
)
Southwestern Bell Telephone Company, L.P., d/b/a)
Southwestern Bell Telephone Company,)
)
Respondent.)

COMPLAINT

The Complainants identified below, by their attorneys, Newman, Comley & Ruth P.C., pursuant to §§ 386.330.3, 386.390.1, 386.400, 392.200.1 RSMo 2000, 4 CSR 240-2.070, and § 276 of the Federal Telecommunications Act of 1996, state as follows for their Complaint against Southwestern Bell Telephone Company L.P, d/b/a Southwestern Bell Telephone Company:

Missouri. Evercom has been duly authorized by the Secretary of the State of Missouri to transact business as a foreign entity. A copy of Evercom's Certificate of Good Standing, which was issued by the Missouri Secretary of State, is attached hereto as Exhibit 6.

- 10. Harold B. Flora d/b/a American Telephone Service is an individual who is authorized to provide private pay telephone service in the State of Missouri.
- 11. Illinois Payphone Systems, Inc. (IPS) is a corporation organized under the laws of the State of Illinois authorized to provide private pay telephone service in the State of Missouri. IPS has been duly authorized by the Secretary of the State of Missouri to transact business as a foreign entity. A copy of IPS's Certificate of Good Standing, which was issued by the Missouri Secretary of State, is attached hereto as Exhibit 7.
- 12. JOLTRAN Communications Corp. (JOLTRAN) is a Missouri corporation, in good standing, and is authorized to provide private pay telephone service in the State of Missouri. JOLTRAN's Certificate of Good Standing issued by the Missouri Secretary of State is attached hereto as Exhibit 8.
- 13. Lind-Comm, L.L.C. (Lind-Comm) is a Missouri limited liability company and is authorized to provide private pay telephone service in the State of Missouri. Lind-Comm's Certificate of Good Standing in the State of Missouri is attached hereto as Exhibit 18.
- 14. John Mabe is an individual authorized to provide private pay telephone service in the State of Missouri.
- 15. Midwest Communication Solutions, Inc. (MCSI) is a Missouri corporation authorized to provide private pay telephone service in the State of Missouri. MCSI's Certificate of Good Standing issued by the Missouri Secretary of State is attached hereto as Exhibit 9.
 - 16. Missouri Telephone & Telegraph, Inc. (MTT) is a Missouri corporation authorized to