## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

Staff of the Public Service Commission of the State of Missouri,	)	
Complainant,	)	
V.	)	Case No. TC-2005-0357
Cass County Telephone Company Limited Partnership,	) )	
Respondent.	,	

## CASS COUNTY TELEPHONE COMPANY'S RESPONSE TO STAFF'S PROPOSED PROCEDURAL SCHEDULE

COMES NOW Cass County Telephone Company Limited Partnership ("CassTel"), and for its Response to Staff's Proposed Procedural Schedule, states to the Missouri Public Service Commission ("Commission") as follows:

- 1. CassTel has no objection to Staff's proposal that the hearing in this case be conducted "live". However, CassTel's primary witness is unavailable for hearing on November 4, 2005. Accordingly, CassTel requests that the hearing be scheduled for only four (4) days, beginning October 31, 2005 and ending no later than November 3, 2005.
- 2. CassTel has no objection to Staff's proposal that all discovery be completed by 5:00 p.m. on October 21, 2005, unless the Commission grants an exception to that deadline for good cause shown.
- 3. CassTel believes that there are significant issues of law, in addition to issues of fact, which can only be adequately presented in a written post-hearing brief.

  Accordingly, CassTel requests a briefing schedule, providing for simultaneous initial

briefs to be filed thirty (30) days after the completion of the hearing transcript and simultaneous reply briefs to be filed fifteen (15) days thereafter.

WHEREFORE, CassTel respectfully request the Commission to adopt the procedural schedule proposed by Staff, and as modified herein, and for such other orders as are appropriate in the circumstances.

Respectfully submitted,

W. R. England, III

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BRYDON, SWEARENGEN & ENGLAND, P.C.

312 East Capitel Avenue

P.O. Box 456

Jefferson City, MO 65102

(573) 635-7166 Phone

(573) 634-7431 Fax

trip@brydonlaw.com (e-mail)

Attorney for Cass County Telephone Company

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent electronically, by U.S. Mail, postage prepaid, or hand-delivered on this 24 to day of July, 2005, to the following parties:

William Haas Robert Franson Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 Michael F. Dandino Senior Counsel Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102

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