

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of MCC )  
Telephony of Missouri, Inc. for a )  
Certificate of Service Authority to Provide )  
Basic Local Exchange, Non-Switched )  
Local Exchange and Interexchange )  
Telecommunications Service in the State )  
of Missouri and to Classify Said Services )  
as Competitive )

Case No. LA-2005-0150

**STAFF RESPONSE TO NONUNANIMOUS STIPULATION**

**COMES NOW** the Staff of the Missouri Public Service Commission and in response to the NonUnanimous Stipulation that was filed on March 18, 2005, states:

1. On November 30, 2004, MCC Telephony of Missouri, Inc. filed a request for a certificate of service authority to provide basic local exchange, non-switched local exchange and interexchange telecommunications service. On January 6, 2005, the Small Telephone Company Group and the Missouri Independent Telephone Group each filed an Application to Intervene, which were granted.

2. After negotiation, MCC and the interveners entered into a stipulation to address any issues that may have been raised by MCC's application. Staff has no objection to the stipulation and has no dispute with the terms of the stipulation, and makes this filing in keeping with the provisions of the Commission's regulation at 4 CSR 240-2.115(2)(B) and (E).

3. To further express its opinion on MCC's application, Staff will file its Recommendation in this matter contemporaneously with this pleading. The Staff Recommendation is not designed to disagree or conflict with the terms of the NonUnanimous Stipulation, and is simply Staff's statement on the merits of MCC's application.

**WHEREFORE**, Staff states that it does not oppose the NonUnanimous Stipulation filed in this matter and indicates that it will file its Staff Recommendation in this matter to further provide the Commission with its position regarding MCC Telephony of Missouri, Inc.'s application.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

**/s/ David A. Meyer**

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 18<sup>th</sup> day of March 2005.

**/s/ David A. Meyer**

David A. Meyer