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**FILED<sup>2</sup>**  
APR 04 2000  
Missouri Public  
Service Commission

April 3, 2000

**RECEIVED**  
APR 04 2000  
COMMISSION COUNSEL  
PUBLIC SERVICE COMMISSION

Bruce Bates  
Missouri Public Service Commission  
301 W. High Street, Suite 530  
Jefferson City, MO 65101

Re: CAT Communications International, Inc. (TA-2000-347)  
Motion for Continuance of Procedural Schedule  
Our File No.: 343

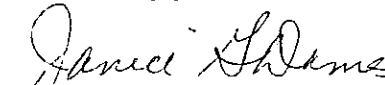
Dear Mr. Bates:

Enclosed please find the original and 14 copies of a Motion for Continuance of Procedural Schedule regarding the above referenced corporation. Please file this motion accordingly. I am enclosing two extra copies of the Motion for return in the enclosed self-addressed, stamped envelopes.

Additionally, please be advised that a copy of the Motion has been sent to the Office of the Public Counsel.

I thank you for your courtesies in this matter. If you have any questions or concerns, please feel free to contact me.

Sincerely yours,

  
Janice G. Dames  
Legal Assistant

jd/  
enclosure  
cc: Office Public Counsel

Sondra Morgan  
c/o Brydon, Swearengen & England P.C.

Mimi McDonald  
c/o SW Bell Telephone

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>

APR 04 2000

Missouri Public  
Service Commission

Case No. TA-2000-347

IN THE MATTER OF THE APPLICATION OF )  
CAT COMMUNICATIONS INTERNATIONAL, )  
INC. FOR A CERTIFICATE OF SERVICE )  
AUTHORITY TO PROVIDE INTEREXCHANGE )  
AND BASIC LOCAL EXCHANGE )  
TELECOMMUNICATIONS SERVICES IN THE )  
STATE OF MISSOURI AND TO CLASSIFY )  
THE COMPANY AS COMPETITIVE )

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**MOTION FOR CONTINUANCE OF PROCEDURAL SCHEDULE**

COMES NOW, CAT Communications International, Inc., Applicant in the above referenced matter and in support of its Motion states as follows:

1. On December 8, 1999 CAT Communications International, Inc. filed an Application with the Missouri Public Service Commission (Commission) for a certificate of service authority to provide resold interexchange and basic local telecommunications service in Missouri and for competitive classification.
2. The Commission issued a Notice of Applications for Intrastate Certificates of Service Authority and Opportunity to Intervene on December 14, 1999.
3. On January 7, 2000, the Small Telephone Company Group (STCG), which is composed of twenty-eight small telephone companies in Missouri, filed an Application to Intervene.
4. On January 10, 2000, Southwestern Bell Telephone Company (SWBT) also filed an Application to Intervene.

5. The Commission issued an Order Granting Intervention and Directing Filing of Procedural Schedule on February 1, 2000.

6. On February 25, 2000 CAT Communications International, Inc. filed a Motion for Continuance of Procedural Schedule requesting that the deadline for filing of the procedural schedule be held in abeyance for thirty (30) days to allow time for a Stipulation and Agreement to be negotiated between the Applicant and the Intervenors.

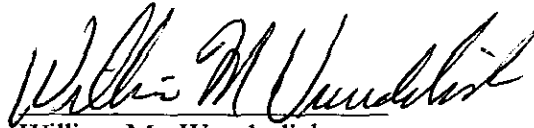
7. Whereas the parties are still negotiating the Stipulation and Agreement, CAT Communications hereby request an additional thirty (30) day extension of time to file a Stipulation and Agreement between the Applicant and Intervenors.

8. All Intervenors have been notified, and no parties had objections to this continuance.

9. Staff has stated that it will need time to review the final Stipulation and Agreement developed by the parties, and therefore, has no objections to this requests. In addition, the Office of Public Counsel has been notified of the Company's desire to file a requests for continuance, and has no objections.

WHEREFORE, CAT Communications International, Inc. hereby requests that the Commission hold the Procedural Schedule in abeyance for thirty (30) days in order to allow time for negotiation of a Stipulation and Agreement between the Applicant and Intervenors to be completed.

Respectfully submitted,

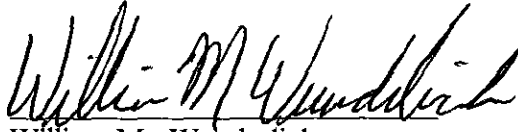
A handwritten signature in black ink, appearing to read "William M. Wunderlich", is written over a horizontal line.

William M. Wunderlich  
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Wunderlich & Associates  
1504 Gravois  
High Ridge, MO 63049  
Phone: (314) 677-5669

Local Counsel for Applicant

## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all parties of record as shown on the attached service list by first-class U.S. Mail, postage prepaid, this 31<sup>st</sup> day of March, 2000.



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Local Counsel for Applicant

### Service List:

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MiMi B. MacDonald  
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St. Louis, MO 63101