

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

In the matter of the application of Power	)	
Station LLC for certificate of service	)	
authority to provide private pay telephone	)	Case No. _____
service within the State of Missouri	)	

**MOTION FOR EXPEDITED TREATMENT**

COMES NOW Power Station LLC (“Applicant”), by and through counsel, and for its Motion for Expedited Treatment pursuant to 4 CSR 240-2.080(16) hereby states:

1. On March 7, 2009 Applicant filed an application for certificate of service authority to provide private pay telephone service within the State of Missouri (“the Application”).

2. Applicant respectfully requests the Commission to issue an Order approving the Application to become effective as soon as possible. Specifically, Applicant requests that the Commission approve the application with an order effective March 25, 2009 if not sooner.

3. Near the conclusion of calendar year 2008, the City of St. Louis and the Lambert-St. Louis International Airport® (Airport) awarded Applicant a Public Communications Services Concession Agreement (the “Agreement”), granting Applicant as Concessionaire the right to design, construct, operate, manage, and maintain a public communication services concession at Lambert Airport.

4. Pursuant to a sub-agreement, Applicant relied on an existing certificated private pay telephone provider (PSP) to supply pay telephone service at the Airport for purposes of complying with the Agreement. The existing PSP has unexpectedly terminated its service and as a consequence, pay telephone service for Airport passengers and patrons will soon be

seriously curtailed if not completely unavailable.

5. AT&T Missouri (AT&T) has advised Applicant that unless an alternate qualified payphone service provider assumes service at the Airport, payphone access lines now serving payphone installations at the Airport will be disconnected on March 25, 2009. If disconnected, AT&T's reconnection of those lines will require approximately 14 days to process leaving the Airport without public payphone services.

6. Applicant respectfully requests that the Commission commence its review of this Application as soon as possible. Inadequate public payphone services at the Airport or any interruption in that service is detrimental to the public interest. Upon certification, and in anticipation of certification, Applicant will proceed as quickly as possible to avoid any confusion or inconvenience to Airport passengers and patrons using payphone services. The public interest fully supports commencement of the review process immediately and supports entry of an expedited order.

7. This motion has been filed at the earliest opportunity possible.

WHEREFORE, for all the reasons stated herein, Applicant respectfully requests that the Commission grant this Motion for Expedited Treatment and issue its order granting the relief requested in the Application with an effective date of March 25, 2009 if not sooner.

Respectfully submitted,

**/s/ Mark W. Comley**

Mark W. Comley #28847  
Newman, Comley & Ruth P.C.  
601 Monroe Street Suite 301  
P.O. Box 537  
Jefferson City, MO 65102-0537  
Phone: (573) 634-2266  
Fax: (573) 636-3306  
Email: [comleym@ncrpc.com](mailto:comleym@ncrpc.com)  
Attorneys for Power Station LLC

**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 7<sup>th</sup> day of March, 2009, to General Counsel's Office at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov); and Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov).

**/s/ Mark W. Comley**